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Teresa Li, SBN 278779

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

RUBEN JUAREZ, an individual and  
ISELA HERNANDEZ, an individual

Plaintiffs,

v.

PRECISION VALVE & AUTOMATION,  
Inc., a corporation and DOES 1-20

Defendants.

**Case No.: 2:17-cv-03342**

*Honorable Otis D. Wright II.*

**PLAINTIFFS' INITIAL EXPERT  
DESIGNATION**

1 Plaintiffs, hereby provide the following designation of expert witnesses pursuant  
2 to FRE 702, 703 or 705.

3 Plaintiffs nominate the following categories of experts. Should new allegations or  
4 contentions be made, plaintiffs reserve the right to nominate and to call at the time of the  
5 trial such further experts as plaintiffs may deem advisable or appropriate. Plaintiffs invite  
6 any other party herein to make known to plaintiffs or their contentions or allegations not  
7 previously set forth.

### 8 **RETAINED EXPERTS**

- 9 1. Howard Pitchon M.D.; [Report Provided Herein]
- 10 2. Glen Stevick Ph.D.; [Report Provided Herein]
- 11 3. Ed Faeder Ph.D.; [Report Provided Herein]
- 12 4. Tamorah Hunt Ph.D. and Timothy Lanning; [Report Provided Herein]

### 14 **NON RETAINED INDIVIDUALS WHO MAY PROVIDE EXPERT**

### 16 **OPINION TESTIMONY**

17 Plaintiffs have not retained the following experts for the purpose of forming and  
18 expressing opinions. However, plaintiffs anticipate that the following non-retained  
19 personnel may testify regarding issues such liability, causation and/or damages:

- 20 1. Joseph Chambers, M.D. of Facey who may testify as to the liability and  
21 the damages of the case;
- 22 2. Shendee Teng, MD of Providence Holy Cross Medical Center who may  
23 testify as to the liability and the damages of the case;
- 24 3. Fung-Chuan Ara G. Tilkian MD of Providence Holy Cross Medical  
25 Center who may testify as to the liability and the damages of the case;

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- 1
- 2 4. Daniel Belayneh MD who may testify as to the liability and the damages of
- 3 the case
- 4
- 5 5. Albert Ko MD of Facey who may testify as to the liability and the damages of
- 6 the case;
- 7 6. Kim Grace MD of Facey who may testify as to the liability and the damages
- 8 of the case;
- 9 7. Kevin Vuong, MD of Facey who may testify as to the liability and the
- 10 damages of the case;
- 11 8. Herrera-Espinoza Haydee MD of Facey who may testify as to the liability and
- 12 the damages of the case;
- 13 9. Tam Te MD of Facey who may testify as to the liability and the damages of
- 14 the case;
- 15 10. Palmer MD of Dignity Health Northridge Hospital who may testify as to the
- 16 liability and the damages of the case;
- 17 11. DeLa Lama MD of Dignity Health Northridge Hospital who may testify as to
- 18 the liability and the damages of the case;
- 19 12. Marcel Maya MD of Cedars Sinai who may testify as to the liability and the
- 20 damages of the case
- 21 13. Asma M. Moheet MD of Cedars Sinai who may testify as to the liability and
- 22 the damages of the case;
- 23 14. Michael J. Alexander MD of Cedars Sinai who may testify as to the liability
- 24 and the damages of the case;
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- 1 15.Ashish D. Patel MD of Cedars Sinai who may testify as to the liability and the
- 2 damages of the case;
- 3 16.Penelope G. Kornbluth RN of Cedars Sinai who may testify as to the liability
- 4 and the damages of the case;
- 5 17.Omotola E. Johnson MD of Cedars Sinai who may testify as to the liability
- 6 and the damages of the case;
- 7 18.Michael Alyesh MD of Cedars Sinai who may testify as to the liability and
- 8 the damages of the case;
- 9 19.Karen Altman MD of Cedars Sinai who may testify as to the liability and the
- 10 damages of the case;
- 11 20.Rachel C. Pearl MD of Cedars Sinai who may testify as to the liability and the
- 12 damages of the case;
- 13 21.Shlee S. Song of Cedars Sinai who may testify as to the liability and the
- 14 damages of the case;
- 15 22.Marcel Maya MD of Cedars Sinai who may testify as to the liability and the
- 16 damages of the case;
- 17 23.Barry D. Pressman MD of Cedars Sinai who may testify as to the liability and
- 18 the damages of the case;
- 19 24.Shervin Eshaghian, MD of Cedars Sinai who may testify as to the liability
- 20 and the damages of the case;
- 21 25.Ronald Lang, MD of Cedars Sinai who may testify as to the liability and the
- 22 damages of the case;
- 23 26.Jay Jurkowitz MD of Cedars Sinai who may testify as to the liability and the
- 24 damages of the case;
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- 26
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1 27. Robert D. Sacks MD of Cedars Sinai who may testify as to the liability and  
2 the damages of the case;

3 28. Mgngnam MD of Digital Health Northridge Hospital who may testify as to the  
4 liability and the damages of the case;

5 29. Susan Kranzpiller MD of Facey who may testify as to the liability and the  
6 damages of the case;

7 30. Chris Aghayan MD of Facey who may testify as to the liability and the  
8 damages of the case;

9 31. Donald Downs MD of Facey who may testify as to the liability and the  
10 damages of the case;

11 32. Ravi Prasad of Cedars Sinai who may testify as to the liability and the  
12 damages of the case;

13 33. Mody Cyrus K. MD of Cedars Sinai who may testify as to the liability and the  
14 damages of the case;

15 34. Robert O. Ruder MD of Cedars Sinai who may testify as to the liability and  
16 the damages of the case;

17 35. Steven Rudd MD of Cedars Sinai who may testify as to the liability and the  
18 damages of the case;

19 36. Mario Salazar Escudero RN of Cedars Sinai who may testify as to the liability  
20 and the damages of the case;

21 37. Elizabeth Homan RN of Cedars Sinai who may testify as to the liability and  
22 the damages of the case;

23 38. Dayle Robson MD of Cedars Sinai who may testify as to the liability and the  
24 damages of the case;

- 1 39. Bernard Tansman of Cedars Sinai who may testify as to the liability and the  
2 damages of the case;
- 3 40. James Tourje MD of Cedars Sinai who may testify as to the liability and the  
4 damages of the case;
- 5 41. Sari M. Cuervo RN of Cedars Sinai who may testify as to the liability and the  
6 damages of the case;
- 7 42. Gregory Castillo MD of Facey who may testify as to the liability and the  
8 damages of the case;
- 9 43. David Shaw MD of Facey who may testify as to the liability and the damages  
10 of the case;
- 11 44. Anthony J. Loffredo MD of Cedars Sinai who may testify as to the liability  
12 and the damages of the case;
- 13 45. Lindsey Christie RN of Cedars Sinai who may testify as to the liability and  
14 the damages of the case;
- 15 46. Menahem Maya MD of Cedars Sinai who may testify as to the liability and  
16 the damages of the case;
- 17 47. Lana L Milton MD of Cedars Sinai who may testify as to the liability and the  
18 damages of the case;
- 19 48. Ronald Andiman MD of Cedars Sinai who may testify as to the liability and  
20 the damages of the case;
- 21 49. Atul Sharma of Facey who may testify as to the liability and the damages of  
22 the case;
- 23 50. Lloyd Wagnes of Facey who may testify as to the liability and the damages of  
24 the case;
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1 51.Zack Rassmussen of Cedars Sinai who may testify as to the liability and the  
2 damages of the case;

3 52.Vahe Mooradian MD of Facey who may testify as to the liability and the  
4 damages of the case;

5 53.Connie Yi Kim RN of Cedars Sinai who may testify as to the liability and the  
6 damages of the case;

7 54.Alan J Coe MD of Cedars Sinai who may testify as to the liability and the  
8 damages of the case;

9 55.Madhavi Lekkala MD of Facey who may testify as to the liability and the  
10 damages of the case;

11 56.Douglas Prisco MD of Facey who may testify as to the liability and the  
12 damages of the case;

13 57.Rabin Nikjoo MD of PHCMC who may testify as to the liability and the  
14 damages of the case;

15 58.Carrole Lewis RN of PHCMC who may testify as to the liability and the  
16 damages of the case;

17 59.Gregory Parany MD of PHCMC who may testify as to the liability and the  
18 damages of the case;

19 60.Rinka Shiraishi RN of Cedars Sinai who may testify as to the liability and the  
20 damages of the case;

21 61.Dayle D Robson of Cedars Sinai who may testify as to the liability and the  
22 damages of the case;

23 62.Jaime A Diaz MD of PHCMC who may testify as to the liability and the  
24 damages of the case;

1 63. Michael Pecoraro RN of PHCMC who may testify as to the liability and the  
2 damages of the case;

3 64. Nichole K Crouch RN of PHCMC who may testify as to the liability and the  
4 damages of the case;

5 65. Christopher Hougen MD of Facey who may testify as to the liability and the  
6 damages of the case;

7 66. Martin Applebaum of Facey who may testify as to the liability and the  
8 damages of the case;

9 67. Magued Beshay MD of Facey who may testify as to the liability and the  
10 damages of the case;

11 68. Dharmesh Patel of Facey who may testify as to the liability and the damages  
12 of the case;

13 69. David Shaw MD of Facey who may testify as to the liability and the damages  
14 of the case;

15 70. Youssef Youssef MD of Facey who may testify as to the liability and the  
16 damages of the case;

17 71. Kevin Vuong MD of Facey who may testify as to the liability and the  
18 damages of the case;

19 72. Meredith R D'Anna RN of PHCMC who may testify as to the liability and the  
20 damages of the case;

21 73. Jamie A Diaz MD of PHCMC who may testify as to the liability and the  
22 damages of the case;

23 74. Barry Wilen MD of PHCMC who may testify as to the liability and the  
24 damages of the case;



1 75.Jong Lee MD of Facey who may testify as to the liability and the damages of  
2 the case;

3 76.Daniel Brison MD of Facey who may testify as to the liability and the  
4 damages of the case;

5 77.Colin W Stokol MD of Cedars Sinai who may testify as to the liability and the  
6 damages of the case;

7 78.Edwin C. Amos, III M.D. who may testify as to the liability and the damages  
8 of the case;

9 79.James High, who may testify as to the liability and the damages of the case;  
10 and

11 80.David Lechuga, who may testify as to the liability and the damages of the  
12 case;

13 81.Ronald Zlotolow M.D., who may testify as to the liability and the damages of  
14 the case;

15 82.Ronald Andiman, who may testify as to the liability and the damages of the  
16 case;

17 83.Steven Schenkel, who may testify as to the liability and the damages of the  
18 case;

19 84.David Alessi, who may testify as to the liability and the damages of the case;

20 85.Jacob Offenberger, who may testify as to the liability and the damages of the  
21 case;

22 86.Jong Charles C. Lee, who may testify as to the liability and the damages of  
23 the case; and

24 87.Abyi Kortan, who may testify as to the liability and the damages of the case.  
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1 88. Thomas Curtis, who may testify as to the liability and the damages of the  
2 case.

3  
4 Plaintiffs reserve the right to call such other percipient experts and/or witnesses,  
5 the necessity for which may be made by unexpected or surprising testimony by experts  
6 for the Petitioners and/or responses to discovery still outstanding as is permitted by the  
7 statute. Moreover, plaintiffs reserve the right to call other experts, and specifically  
8 reserve all rights conferred by CCP §§ 2034.310, 2034.610 and 2034.620. Plaintiffs  
9 expressly reserves the right to retain and call at the time of trial additional and other  
10 prospective witnesses in the event that deposition testimony from the various experts  
11 designated by other parties to this lawsuit should make such further action necessary in  
12 the interest of fairness and justice. Plaintiffs reserve the right to supplement, augment,  
13 alter, withdraw, and add experts and reports as discovery requires up and through the  
14 time set for trial.  
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20 DATED: October 29, 2018

BALABAN & SPIELBERGER, LLP

21  
22 /s/ Vanessa Loftus-Brewer

23 Daniel K. Balaban

24 Andrew J. Spielberger

25 Vanessa L. Loftus-Brewer

26 Attorneys for Plaintiffs  
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EXPERT REPORT OF  
HOWARD PITCHON M.D.

## **I. INTRODUCTION**

I, HOWARD PITCHON, M.D., have been retained by Plaintiffs in this matter to render medical opinions on the cause of Ruben Juarez' injuries. Based on my review of medical records, toxicologist reports, and appointment with Ruben Juarez, the declaration of Ed Faeder, my education, training, research experience, I hereby provide the following opinions and discuss the bases therein below:

1. Ruben Juarez' symptoms are caused by toxic exposure to chemicals.
2. The medical history of Ruben Juarez shows that, to a reasonable medical probability, Ruben Juarez' conditions were caused by the toxic chemical exposure while he was working at Space Exploration Technologies.

Based on statements made by Ruben Juarez, Mr. Juarez worked at Space Exploration Technologies from 2012 to March 26, 2014, which caused toxic exposure to the following chemicals: Arathane® 5750A, Arathane® 5750B, Arathane® 5750A/B, Humiseal®, Humiseal® thinner 521, and Isopropyl Alcohol ("IPA"). The exposure to toxic chemicals as set forth in the Declaration of Ed Faeder caused Mr. Juarez' injuries.

## **II. BACKGROUND/QUALIFICATIONS**

I am a medical doctor who specializes in infectious diseases and internal medicine. I am board-certified in both internal medicine and infectious diseases. I was the Clinical Chief of Infectious Disease at Cedars-Sinai Medical Center from 1991 to 1995. I am a member of several professional organizations and have authored or co-authored numerous medical publications. I currently have a practice in Los Angeles, California treating patients with infectious diseases. My practice also includes internal medicine. Furthermore, I offer consultation to hospitals and physicians at various locations including Cedars-Sinai Medical Center. Additionally, I offer medical/legal consultation. Attached as Appendix 1 is a copy of my Curriculum Vitae, and attached as Appendix 2 is a list of my previous testimony for the past four years and attached as Appendix 3 is my fee schedule for litigation<sup>1</sup>.

I received a B.S. degree from the University of Michigan in 1968 and a M.D., from Jefferson Medical College in 1972, graduating magna cum laude. My post-graduate training began at Harbor General Hospital in Torrance, CA, where I worked as a medical intern and resident in internal medicine. I then worked as a clinical associate at the United States Public Health Service, a branch of the National Cancer Institute in Bethesda, MA. After my time at the National Cancer Institute, I returned to Harbor General Hospital in Torrance, CA where I participated in a fellowship in infectious diseases.



Over the last 30 years or so I have been appointed to academic positions and/or professorships at various hospitals, including Cedars-Sinai, VA Wadsworth Medical Center, Monmouth Medical Center, and UCLA School of Medicine. While I was an assistant attending physician at Monmouth Medical Center in Long Branch, New Jersey I was involved specifically in pediatric infectious disease. Over the course of my career I have significant training and experience in pediatric infectious disease. I have served as a consultant to other physicians and hospitals regarding the diagnosis of infectious disease. I have diagnosed many cases of viral and/or bacterial infections both as a consultant and as a primary care physician in my private practice.

### **III. MATERIALS REVIEWED AND KNOWN TO DATE**

I have reviewed the following case-specific materials in preparation for my testimony:

1. Appointment with Ruben Juarez on October 27, 2018 for 2.5 hours at which time a history and physical examination were performed.
2. Medical Records of Ruben Juarez;
3. Toxicologist Reports; and
4. Expert Declaration of Ed Faeder.

In addition to the case specific materials I reviewed, I base my opinions on various published articles and literature that I have reviewed over the course of my career, some of which are listed in Exhibit 1 as well as my education, training, research, and experience. All of my opinions rendered in this report are made with a reasonable degree of medical certainty. This report does not contain all of the opinions that I hold in this case and I reserve the right to supplement my opinions, if and when, additional information becomes available.

### **IV. MEDICAL HISTORY/FACTS**

Ruben Juarez (DOB 1/9/1970), a 42-year-old previously healthy married man, began working for Space Exploration, Inc. on January 16, 2012.

About seven months after working for Space Exploration, on June 27, 2012, Juarez presented to Providence Holy Cross Medical Center urgent care for anxiety and palpitations with feeling of presyncope. Juarez was later transferred to Holy Cross Hospital and was discharged.

In the next seven months, Juarez made frequent visits to doctors for sinus issues and headache. His physician, without performing any diagnostic studies at that time, treated him with antibiotics. When this failed to be effective, he was



given either another antibiotic or a higher dose of the antibiotic and an antihistamine. Ultimately, he saw an ENT physician who felt that there was no evidence for a sinus infection. He subsequently developed vertigo and later tinnitus.

Then on January 7, 2013, he was diagnosed with 9 mm un-ruptured right anterior communicating artery cerebral aneurysm by Dr. Palmer at Digital Health Northridge Hospital. He was immediately transferred to Cedars Sinai for coiling. On January 8, 2013, Dr. Michael J. Alexander, a neurosurgeon, performed endovascular coil embolization of the non-ruptured anterior communicating artery aneurysm. The coiling was successful; however, Juarez continued to complain headache.

After the coil embolization, Juarez continued to complain persistent headache; first low grade then developed into severe headache, and as a result, he made frequent visits to urgent care, ERs, and hospitals. In addition, he reported to have difficulty with sleep, awakening in the morning not knowing where he was, was jumping out of bed and almost sleepwalking, became forgetful, blurred vision. CT scan of the brain showed no evidence of subarachnoid hemorrhage.

On January 15, 2013, Juarez was hospitalized in Cedars Sinai for 4 days and reported to have persistent headache and fatigue both before and after the surgery. He also felt dissociation between mind and body, as if he is there, but he is not really there. He stated that he had episode of sleepwalking, confused at times, and his balance was off with blurry vision. There, two neurologists and a cardiologist were consulted and subarachnoid hemorrhage and cardioembolic source of embolism were ruled out. He was seen by an ophthalmologist but there was no definite neuroophthalmology diagnosis.

Juarez's severe headache and dizziness persisted and frequent sinus issues and he continued to make frequent doctor visits. On March 4, 2013, he was noted to have difficulty recalling specific names of people following him for his conditions.

From March 13, 2013, Juarez was hospitalized at Cedars Sinai for 9 days for severe and prolonged headache with nausea, photophobia, and dizziness. During the hospitalization, neurologist Dr. Cyrus Mody notes that on neurological exam, he does have significant cervical paraspinal muscle and trapezius spasm. ENT was consulted but determined that it was not an ENT issue. Dr. Michale Alyesh notes that "It was unclear if this headache was related to the aneurysm or not."

Juarez continued to have severe headache and dizziness. He also started having chest pain. But on May 23, 2013, Dr. Shervin Eshaghian, a cardiologist



from Cedars Sinai notes “from a cardiac perspective his chest pain is atypical.” His CT scan of his brain shows “no evidence for subarachnoid, subdural or intraventricular hemorrhage.”

On July 15, 2013, Juarez was hospitalized for 6 days at Cedars Sinai for headache. He stated “I feel like my head is going to explode.” Dr. Alexendar personally reviewed the CT of his brain and notes “no evidence of subarchnoid hemorrhage or hydrocephalus.” Psychiatry was consulted and he was diagnosed with depression. On July 18, 2013, Juarez began seeing Dr. Ronald Andiman for headache management. Dr. Andiman diagnosed him with chronic migraine, analgesic rebound, and reactive depression. Dr. Andiman thought the overuse of medication may be playing a role in the persistence of the headache and stopped all narcotic medication and it was estimated that at 3-5 days in, Juarez would become headache free. Juarez reduced and stopped narcotic medication; however, his migraine persists.

On March 27, 2014, Juarez stopped working at Space Exploration.

On June 12, 2014, he was hospitalized at Cedars Sinai for 2 days for intractable headaches. Dr. Andiman recommended reinstating treatment with DHE for a more sustained period of time in order to break the headache cycle but Juarez was reluctant to do this. Psychiatry was consulted and Juarez stated occasionally he had suicidal ideation when his headaches were quite severe. Psychiatrist Alan Coe diagnosed him with “significant depression and anxiety, all of which appear to be secondary to his physical problems which have rendered him unable to work or really to enjoy his life.” He was diagnosed with major depressive disorder, recurrent, and generalized anxiety disorder. Juarez agreed to stop all narcotics.

On September 10, 2014, it is the first medical note where chemical exposure was referenced. It states, “someone at work was cleaning electrical stuff and started having headaches after that.”

Juarez continued to visit ER and urgent care for persistent severe migraine and sleep issue. In late May of 2015, he developed mild epigastric abdominal discomfort and was seen multiple times at Facey Medical Group urgent care. Pantoprazole and omeprazole were discontinued per physician’s order. However, the abdominal pain continued.

On July 10, 2015, Juarez’s brain MRA performed at Cedars Sinai shows normal status post coil embolization. Juarez had an electro-encephalogram done on August 2, 2016 and the result was normal. His EEG on November 9, 2016 was normal. On November 10, 2016, Dr. Eshaghian (cardiologist) notes that Juarez’s



symptoms don't seem to be cardiac in origin. On December 1, 2016, Dr. Andiman agrees with Dr. Alexander's conclusion that Juarez's aneurysm did not grow from 1.5 to 4.4 mm, contrary to the initial thought by other doctor.

During a 7-day hospitalization at Cedars Sinai from 2/10/17 to 2/17/17, Dr. Andiman notes that Juarez "has taken occasional doses of opioid medication at home but has never abused such medication." Dr. Andiman diagnosis include "Juarez has chronic migraine with associated cervical myofascial pain and occipital neuralgia. Recurrent epigastric pain and other abdominal pain. Dizziness, sometimes a sense of lightheadedness and other times a sense of vertigo. Shortness of breath, low endurance, sense of generalized weakness. Juarez is anxious and his behavior suggests obsessive behaviors as well, corroborated by his psychiatrist."

Juarez continues to have severe and chronic migraine even though his radiologist and Dr. Andiman felt no change in the aneurysm. Juarez continues to be hospitalized for severe headache. Dr. Andiman has been managing Juarez's headache.

## **V. Opinions**

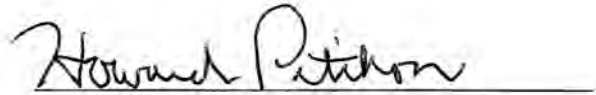
Based on my history and physical examination of Mr. Juarez, review of his medical records, review of the toxicologist's reports, review of the Declaration of Edward Faeder, Ph.D. and indicated literature, I have formulated the following opinions due to a reasonable degree of medical certainty:

1. Mr. Juarez's chronic neurologic problems of recurrent disabling headaches that have required intermittent hospitalization for control, dizziness/vertigo, memory and cognitive difficulties with associated nausea, increased fatigue and tiredness are related to his toxic exposure to the above listed chemicals to a reasonable degree of medical certainty.
2. Mr. Juarez's respiratory problems of head congestion, dry non-productive cough, shortness of breath, and intermittent chest pains are related to his toxic exposure to the above listed chemicals to a reasonable degree of medical certainty.
3. Mr. Juarez appears to have depression and anxiety for which he is receiving multiple medications related to the overall ongoing chronic medical conditions as noted above to a reasonable degree of medical certainty.



4. Mr. Juarez is unable to work due to his multiple chronic medical conditions which have been disabling related to their persistent, relentless course and the inability to control these problems medically which again is related to the toxic exposure to the above listed chemicals to a reasonable degree of medical certainty.
5. Mr. Juarez's prognosis for recovery from the toxic exposure to the listed chemicals appears to be poor, less than 50%, in view of the prolonged 6 year course with still no adequate control of his medical problems.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on October 29, 2018.

A handwritten signature in black ink, reading "Howard Pitchon", written over a horizontal line.

Howard Pitchon, M.D.

**HOWARD PITCHON, M.D.**  
8920 Wilshire Boulevard  
Suite 330  
Beverly Hills, California 90211  
(310) 657-3719

DIPLOMATE, AMERICAN BOARD OF INTERNAL MEDICINE  
DIPLOMATE, AMERICAN BOARD OF INFECTIOUS DISEASE

**To Whom It May Concern:**

**Re: Professional Services:**

**The following are my expert witness fees:**

- 1) **Review of medical records, review of depositions and any other materials pertaining to the case, conferences with the attorney @ \$500.00/ hr.**
- 2) **Deposition @ \$ 750.00/hr.**
- 3) **Appearance in court:**
  - a) **Half a day \$3,500.00**
  - b) **Whole day \$6,500.00**
- 4) **Retainer fee \$5000.00**

**Please do not hesitate to contact me @ 310-657-3719 if there are any further questions.**

**Thank you.**

**Sincerely,**

**Howard Pitchon, M.D.**

---

## **CURRICULUM VITAE**

HOWARD PITCHON, M.D.

**Born:** October 4, 1946  
Philadelphia, PA

**Citizenship:** U.S.A  
**Marital Status:** Married  
**Education:** University of Michigan, Ann Arbor, MI  
B.S. – 1968  
  
Jefferson Medical College, Philadelphia, PA  
M.D. – 1972, Magna cum laude

**Awards:** Physiology Prize – 1969  
Pathology Prize – 1970  
Lange Medical Publication Award – 1969  
Mosby Book Award – 1972

**Postgraduate Training:** Harbor General Hospital, Torrance, CA  
Straight Medical Internship, 1972 – 1973  
  
Harbor General Hospital, Torrance, CA  
Resident in Medicine, 1973 – 1974  
  
U.S. Public Health Service, National Institutes of Health,  
National Cancer Institute, Metabolism Branch, Bethesda, MD,  
Clinical Associate, 1974 – 1975  
  
Harbor General Hospital, Torrance, CA, Fellowship in Infectious  
Diseases, 1975 – 1977 and VA Wadsworth Medical Center,  
Los Angeles, CA.

**Appointments:** Director, Adult Ambulatory Care, Department of Emergency  
Medicine, Harbor General Hospital, Torrance, CA. 1977 – 1978  
  
Staff Physician, Department of Infectious Diseases, Harbor  
General Hospital, Torrance, CA. 1977 – 1978  
  
Assistant Professor of Medicine, UCLA School of Medicine,  
Los Angeles, CA. 1977 – 1980

## **CURRICULUM VITAE**

**HOWARD PITCHON, M.D.**

Page 2

### ***Appointments***

**(Continued)**

Research Associate, VA Wadsworth Medical Center, Los Angeles, CA. 1977 – 1980

Professional Staff Association of Harbor – UCLA Medical Center, 1977 – 1980

Assistant Attending in Medicine, Monmouth Medical Center, Long Branch, N.J. 1980 – 1985

Chairman, Infection Control, Monmouth Medical Center, Long Branch, N.J. 1980 – 1985

Chief, Infectious Disease Section Department of Medicine, Monmouth Medical Center, Long Branch, N.J. 1980 – 1985

Associate Attending in Infectious Disease, Cedars – Sinai Medical Center, 1985 – 1989

Attending in Infectious Disease, Cedars – Sinai Medical Center, Los Angeles, CA, 1989 to present

Clinical Chief, Infectious Diseases, Cedars-Sinai Medical Center, 1991-1995

Attending in Infectious Disease, Southern California Hospital at Culver City (formerly Brotman Medical Center) 1985 to present

### ***Professional***

**Societies:**

Alpha Omega, Alpha – 1971

American College of Physicians – 1977

American Society of Microbiology – 1977

American Federation for Clinical Research – 1975

Infectious Disease Society of America – 1977

**Licensure:**

California, 1973



**Certifications:** American Board of Internal Medicine – 1975  
American Board of Internal Medicine,  
Sub-specialty in Infectious Diseases – 1978

## **Committees**

Infection Control Committee, Monmouth Medical Center 1980-1985

Antibiotic Utilization Review Committee, Cedars-Sinai Medical Center, 1986 – present

Infection Control Committee, Cedars-Sinai Medical Center, 1986 – 2000

Infection Prevention Committee, Southern California Hospital at Culver City(formerly Brotman Medical Center), 2001-2005; 2007 – present

Pharmacy and Therapeutics Committee, Southern California Hospital at Culver City(formerly Brotman Medical Center), 2011-to present

## **Publications**

1. Bayer AS, Pitchon HE. Hall RW, Mayer WP, Yoshikawa TT, and Guze LB. Infective endocarditis following human-to human transmission of group D Streptococcus. Arch Int Med. 136:1173-1174. 1976.
2. Bayer AS. Targan SR. Pitchon HE. and Guze LB. Miliary pulmonary infiltrates and hypoxemia- an unusual manifestation of Dilantin toxicity. Ann Intern Med 85:475-746,1976.
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**HOWARD PITCHON, M.D.**

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**DIPLOMATE, AMERICAN BOARD OF INTERNAL MEDICINE**

**DIPLOMATE, AMERICAN BOARD OF INFECTIOUS DISEASE**

**Prior Testimony**

During the past four years Dr. Pitchon has provided testimony at deposition and/or trial in the following litigations:

- *Holly Dann v. San Fernando Valley Group, et al* (Los Angeles County Superior Court, 2014)<sup>1</sup>
- *Pekarovics v. Buch* (Los Angeles County Superior Court, 2014)
- *Margaret Newsome v. Timothy Katzen* (Los Angeles County Superior Court, 2014)
- *William Bivens, et al. v. HealthCare Partners Medical Group, et al.* (Los Angeles Superior Court, 2014)
- *Guzman v. Kaiser Foundation Hospitals, et al.* (Kaiser Binding Arbitration 2014)
- *Kris Krishnan v. Specialty Laboratories, Inc.* (Workman's Compensation Appeals Board, 2014)
- *Theresa Murray v. Terry Cole* (Ventura County Superior Court, 2014)
- *Avedisian v. Merced-Benz, USA, LLC* (United States District Court, Los Angeles, 2014)
- *Ida Waksberg v. Saint John's Hospital, et al.* (Los Angeles County Superior Court, 2014)
- *Liu v. College Hospital, Inc., et al.* (Los Angeles County Superior Court, 2015)
- *Ruth Rivera v. Foster Farms, et al.* (Los Angeles County Superior Court, 2015)
- *Silvia Zarantonello and Oscar Zarantonello v. Torrance Memorial Medical Center and Torrance Home Health and Hospice* (Los Angeles County Superior Court, 2015)
- *Tracey E. Pratt & Larry S. Pratt v. Ervin P. Ruzics, M.D.: Edward E. Aston, IV, M.D et al.* (Orange County Superior Court 2015)
- *Goth v. Luis Kobashi* (Orange County Superior Court 2015)

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<sup>1</sup> The year listed in each bullet refers to the year in which Dr. Pitchon's testimony was given, not necessarily the year in which the case was filed.

**PRIOR TESTIMONY**  
**HOWARD PITCHON, M.D.**  
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- *Alexandra Lebedeff v. Embassy Suites Management, LLC* (Los Angeles County Superior Court, 2015)
- *Paul Magiera, Special Administrator of the estate of John Magiera, Deceased v. Northshore University Healthsystem, et al.* (Circuit Court of Cook County, Illinois County, 2015)
- *Narvaez v. Garden Grove Hospital* (Orange County Superior Court 2015)
- *Volkel v. Colman, M.D.* (Los Angeles County Superior Court, 2015)
- *Laks v. Regents of the University of California* (Los Angeles County Superior Court, 2015)
- *Vokel v. Colman, M.D.* (Los Angeles County Superior Court, 2016) (BC 524074)
- *Robertson v. McNeil-PPC, et al.* (C.D. Cal., 2016) (11-cv-09050)
- *Victor Person v. OrthoMcNeil Janssen Pharmaceuticals, Inc., et al.* (C.D. Cal., 2016) (2:11-cv-03333)
- *Emil Rutenberg v. OrthoMcNeil Janssen Pharmaceuticals, Inc., et al.* (C.D. Cal., 2016) (2:12-cv-08744)
- *Katherine Jeannie West v. OrthoMcNeil Janssen Pharmaceuticals, Inc., et al.* (C.D. Cal., 2016) (8:12-cv-01657)
- *Chaidez/Zuniga v. Ciceno, et al.* (Circuit Court of Cook County, Illinois, 2016) (12 L 7294)
- *John I. Handal v. Henry Chan Myint Yee, M.D.* (Los Angeles County Superior Court, 2016) (GC 050114)
- *Paul Magiena, Special Administrator of the Estate of John Magiena, Deceased v. Northshore University Health System, et al.* (Circuit Court of Cook County, Illinois, 2016) (12 L 13753)
- *Jazmine Domenzain v. Bruce Hicke, D.D.S., et al.* (Los Angeles County Superior Court, 2016) (BC 543252)
- *White v. Trovato, et al.* T(San Diego County Superior Court, 2016) (37-2014-00021832)
- *Jones v. Moy, M.D.* (Los Angeles County Superior, 2016) (BC 541858)
- *Clark v. Bakersfield Heart Hospital, et al.* (Los Angeles County Superior Court, 2016) (BC 513780)
- *Alai, M.D. and Nabili v. Barbara Ha-Sui Shang, M.D.* (Orange County Superior Court, 2016) (30-2012-00591704)
- *Larkin v. Regents of the University of California, et al.* (Los Angeles County Superior Court, 2016) (BC 567144)



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- *Carillo v. Alvarez, M.D., et al.* (Kern County Superior Court, 2016) (S-1500-cv 278424)
- *Shaheroz Piredina Ramzan v. The BMW Group, et al.* (Los Angeles County Superior Court, 2016) (BC 501570)
- *Camarena v. Western Medical Center, Anaheim, et al.* (Orange County Superior Court, 2016) (30-2015-00771101)
- *Biloto v. Go, et al.* (Circuit Court of Cook County, Illinois, 2017) (13 L 10803)
- *Fountain v. Desert Regional Medical Center, et al.* (Riverside County Superior Court, 2017) (INC 1302256)
- *Victoria v. Leviton, et al.* (Los Angeles County Superior Court, 2017) (BC 541698)
- *Keltner Family Trust, et al. v. Californian-Magnolia Convalescent Hospital, Inc., et al.* (Riverside County Superior Court, 2017) (RIC1410295)
- *Torres v. The Regents of the University of California aka UCLA Medical Center, et al.* (Los Angeles County Superior Court, Santa Monica, 2017) (SC 123494)
- *Michael Praten v. IHA, et al.* (Circuit Court for the County of Washtenaw, Michigan, 2017) (16-006-NM)
- *High v. Mount Sinai Hospital, et al.* (N.D. Ill. 2017) (2014 L9841)
- *Van Acker v. Regents of the University of California, et al.* (Orange County Superior Court, 2017) (30-2015-00814741)
- *Ken Abalos, et al. v. Mountain View Regional Medical Center, et al.* (County of Dona Ana, Third Judicial District, New Mexico, 2017) (D 307 CV 2014 00101)
- *Lunasco v. St. Jude Medical Center, et al.* (Orange County Superior Court, 2017) (30-2013-00653823)
- *Middleton v. Hollywood Health Center, et al.* (Los Angeles County Superior Court, 2017) (BC 595760)
- *Cotton v. Adam Lee, D.O. and EM Strategies, Ltd.* (Circuit Court of Twelfth Judicial Circuit, Will County, Illinois, 2017) (14 L 00563)
- *Rita Cooper vs. Mathew Smith, M.D.* (Circuit Court of Boone County, Missouri, 2017) (15BA-CV00590)
- *Quinten Buschschulte v. Mark Box, M.D., et al.* (Circuit Court of Jackson County, Missouri, 2017) (1616-CV08612-Div. No. 16)
- *Ahmad Rafifar, et al. v. Sanjeev Kumar Seth, M.D., et al.* (Los Angeles County Superior Court, 2018) (BC608234)

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- *Pedro Gonzalez v. Ricardo E. Chambi, M.D., et al.* (Los Angeles County Superior Court, 2018) (BC557013)
- *Danguole Laurinaviciene v. Robert Erickson, M.D., et al.* (Cook County Circuit Court, Illinois, 2018) (2013L013218)
- *Alaniz, et al. v. Citrus Valley Medical Center-QV Campus, et al.* (Los Angeles Superior Court, 2018) (BC530626)
- *Bonnie J. Smith v. Board of Regents of UNM* (County of Bernalillo, Second Judicial District, New Mexico, 2018) (D-202-cv-2016-00370)
- *John Mathews by and through His Successor, et al. v. Pomerado Inc., et al.* (San Diego County Superior Court, 2018) (37-2015-00042306-CU-PO-NC)
- *Fair v. Eric Travis, D.P.M., Inc.* (Orange County Superior Court, 2018) (30-2015-00793356-CU-MM-CJC)
- *Zwierlein v. Devon Glazer, et al.* (Orange County Superior Court, 2018) (30-2012-00579320-CU-MM-CJC)
- *Toeppe v. City of San Diego* (San Diego County Superior Court, 2018) (37-2014-00004836-CU-PO-CTL)

# EXPERT REPORT OF GLEN STEVICK



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## EXPERT REPORT

*In Reference to:*

**Ruben Juarez And Isela Hernandez v. Precision Valve & Automation**

**UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA**

*Glen Stevick, Ph.D., P.E.*

*Berkeley Engineering And Research, Inc.*

October 29, 2018

*Report Submitted to:*

Daniel K. Balaban, Esq.  
BALABAN & SPIELBERGER, LLP  
11999 San Vicente Blvd., Suite 345  
Los Angeles, CA 90049

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## **I. Introduction**

Berkeley Engineering and Research Inc. (“BEAR”) was retained by Balaban & Spielberger LLP to assess the design and warnings of the PVA 350 machine (Serial Number W3267) utilized at Space Exploration Technologies by Ruben Juarez during his employment from 2012 to March 26, 2014.

## **II. Qualifications**

I am a mechanical engineer with over 35 years of experience and a specialty in failure analysis, design and risk assessment. I have performed and participated in the failure analysis, risk assessment, design and redesign of numerous products, equipment and processes, including computer chip manufacturing processes, battery powered travelers for the Golden Gate Bridge, inspection robots, blow out preventers, air quality sensors, CNC machines and their enclosures, vacuum forming machines and enclosures, ventilation systems and a wide variety of processing plant equipment. My Curriculum Vitae and testimony list are attached to this report. I have been an instructor at U.C. Berkeley in the College of Engineering teaching the senior design course where I conducted lectures on the design of mechanical systems and products, system controls, safety factors and risk assessment in design.

I am a Registered Professional Engineer in the states of CA, NV, TX and LA, and a member of the American Society of Mechanical Engineers and American Society of Testing and Materials. I have qualified as an expert regarding mechanical and electrical engineering issues in United States' State and the Federal Courts. I have testified regarding engineering issues similar to the ones involved in this case. I am experienced and knowledgeable in the design and analysis of control systems, interlocks and risk analysis in design.

I received a Bachelor of Science in Mechanical Engineering from Michigan Technological University in 1980, and a Master of Science in Mechanical Engineering from The University of California, Berkeley in 1981. I worked for Chevron Corporation during and after my time at school working toward my master's degree. In 1989 I returned to the University of California, Berkeley and started BEAR. I completed my Ph.D. in Mechanical Engineering from the University of California, Berkeley in 1993 concentrating in material behavior and design, with minors in structural analysis and dynamics and controls (electronic controls).

I am currently employed by and am a principal of Berkeley Engineering And Research, Inc. (BEAR), 808 Gilman St., Berkeley, California 94710. My company (BEAR) is being compensated at my standard consulting rate of \$450.00 per hour. My compensation is not contingent upon the substance of my report, any statements or opinions made, or the outcome of

this matter. My opinions are based on the scientific method of inquiry and given to a reasonable degree of engineering and scientific certainty.

### **III. Material Reviewed**

In formulating my opinions, I specifically have reviewed the following materials:

1. The 2015 and 2018 depositions of Ruben Juarez as well as all exhibits including brochures, comparison charts, and the PVA Inc. promotional materials, videos of conformal coating process, video of the demonstration in April at PVA Inc. of the conformal coating process.
2. The declarations submitted in support of PVA Inc.'s Motion for Summary Judgment as well as the supporting exhibits.
3. Declarations in Support of Plaintiffs' Opposition to the Defendant's Motion.
4. The references cited in this report.

### **IV. Opinions and Basis**

The subject machine, a PVA 350, was manufactured, designed, and sold by PVA Inc. The purpose of the subject machine was to safely coat circuit boards with a layer of coating material after which the circuit boards were to be placed inside rockets. This coating process was completed to ensure there were no electrical sparks on the circuit board that could result in an explosion inside the rockets. The subject machine was defective in terms of its safety interlocks and warnings as set forth below.

PVA Inc. also manufactures a number of other coating machine models for larger operations and plant conformal coating operations as well as small hand-held machines. Each PVA model machine is different, and the PVA 350 machine does not contain certain safety features for its intended purposes such as a safety interlock to prevent spraying during Manual and Calibration modes with the door open, particularly for low volume applications like at SpaceX. An internal camera or other method to allow safe viewing in these modes could have easily been implemented. These features were readily available at the time of the manufacture of the subject machine.

Following the sale of the PVA 350 machine, the purchasers and their designated employees undergo training to learn how to operate the PVA machines. Based on the statements

of Ruben Juarez, he was trained by PVA Inc. to put his head inside the PVA 350 machine without a ventilation mask. The PVA manual does not warn individuals working the PVA machines to wear facemasks with ventilators. Based on the dimensions of the machine, the use of the PVA 350 machine with a ventilation face mask is not feasible. The machine should not allow spraying while the doors are open (in the bypass mode).

After installing the machine, PVA Inc. continued to service the machine, make modifications to the machine, and assisting Space X in making modifications to the machine. Unfortunately, this additional work occurred without ensuring the safety of the intended end users. Indeed, PVA Inc. through its continued support and maintenance of the machine knew or should have known of Space X's use of toxic sealants in the conformal coating process.

It is the custom and practice for manufactures to anticipate a reasonable degree of mistaken and/or misuse and take this into account in designing their product<sup>1</sup> and design in adequate "layers of protection" to prevent injury and unnecessary exposure to chemicals.<sup>2</sup> As such, PVA Inc. has a duty to protect end users from anticipatable misuse, assess the risk, and eliminate those risks. Adjusting and programming the coating machines way points is a tedious task; PVA should have anticipated SpaceX and other users spraying and adjusting with the doors open to setup production.

It is my opinion that the PVA 350 was defectively designed as the risk of spraying coatings with the door open outweighed any potential benefits and a worker would reasonably not expect to be harmed while using the PVA 350 as instructed. Additionally, PVA Inc. failed to warn about the dangers of using the machine. This opinion is based on the photographs of the machine, the PVA manual, videos of the conformal coating process, email exchanges between PVA Inc. and Space X, the depositions taken in this matter, the design of the PVA 350, the dimensions of the PVA 350, the lack of adequate safety warnings of the PVA 350, the promotional materials, the documents produced in discovery, the designs of other PVA machines, the declarations submitted in this matter, pertinent records, invoices, work order modifications, which show PVA Inc. was aware how the machine was being utilized and did not take steps to ensure the safety of the end users. It should be noted that warnings are not just for

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<sup>1</sup> The Design of Everyday Things by Don Norman, Basic Books, New York, New York, 2013. Effective FMEAs, by C.S. Carlson, John Wiley & Sons, 2012. DFR Fundamentals, An Introduction for Design Reliability, 2007. Copyright ReliaSoft Corporation. Engineering Design – A systematic Approach, 3<sup>rd</sup> Edition, by G. Pahl, W. Beitz, J. Feldhusen and K. H. Grote; edited and translated by K. Wallace and L. Blessing, Springer-Verlag, 2007. Failure Modes Effect Analysis: FMEA from Theory to Execution, Second Edition, D.H. Stamatis, American Society of Quality, 2003. The Field Guide to Understanding Human Error by S. Dekker, Ashgate Publishing Limited, 2006. The FMEA Pocket Handbook by Kenneth W. Dailey, Editors: Martha Minturn, Doug Wieckhorst, Bruce Welch and Port Saint Lucie, DW Publishing Company, 2004.

<sup>2</sup> Layers of Protection Analysis: Simplified Process Risk Assessment, Center for Chemical Process Safety of the American Institute of Chemical Engineers, New York, New York, 2001.



the user or operator, they are also for the designer. If warnings are properly developed during the design process, they provide a chance for the designers to eliminate the hazard they are warning about.<sup>3</sup> The process of developing warnings and warning prototypes frequently reopens the analysis of a hazard(s) and/or reveals new accident scenarios that might be associated with a previously recognized hazard.

Specifically, my opinion is that the PVA 350 is defective in design because PVA Inc. should have taken steps during the manufacturing and design processes to mitigate the risk of harmful exposure by considering the foreseeable use of end users including the various available coating chemicals. Significantly mitigating risk could have been easily done by:

(i) altering the design of the PVA 350 so that the interior can be monitored with cameras and/or mirrors so that the end user need not place their head within the confined space at anytime;

(ii) equipping the PVA 350 with an airflow sensor(s) (to the extent that it does not have them) and interlocks that prevent the operation of the PVA 350 unless the ventilation system is operating with adequate flow (e.g. 150 CFM as noted in PVA's Manual). Air flow sensors are commonly used to ensure ventilation systems are operating properly;

(iii) equipping the PVA 350 with a time delay interlock(s) that prevents opening the PVA 350 until the ventilation system has adequately cleared the interior airspace of the PVA 350 of harmful vapors. Time delays to allow gas purging and/or cooldown are common in a variety of equipment (home HVAC equipment is an example);

and,

(iv) eliminating **local** overriding or bypassing of safety systems that allow coating spraying in the PVA 350 with the doors open. Bypassing safety components on machinery is considered an "at risk behavior" in engineering safety design.<sup>4</sup> Controls that can be easily bypassed are a known risk that have resulted in numerous injuries and fatalities in processing plants from food to chemical to manufacturing to computer chip manufacturing.

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<sup>3</sup> Frantz, J. P., Rhoades, T. P., & Lehto, M. R. (1999). Practical considerations regarding the design and evaluation of product warnings. In M. S. Wogalter, D. M. DeJoy, & K. R. Laughery (Eds.), *Warnings and risk communication* (pp. 291–311). Philadelphia, PA: Taylor & Francis. Nemire, K., Stevick, G., and D. Xu, "Forensic Evaluation of a Hazardous Household Product." *Ergonomics in Design*, 25(2) (2017) 15-24.

<sup>4</sup> Sustainable Safety Management: incident management as a cornerstone for a successful safety culture, by B. Freibott, SAP Germany AG & Co. KG, Germany, *Safety and Security Engineering*, Vol. 257, 2013. ConocoPhillips Marine: Safety Pyramid based on a study, April 2003.

PVA Inc. likewise failed to provide proper warnings to its end users as to the use of toxic materials and proper ventilation/protection. Specifically, the PVA 350 failed to have an adequate warning because PVA Inc. failed to take steps to warn its customers and end users that the PVA 350 machine could expose the user to toxic chemicals or exposure could occur while using the PVA 350 and placing their head inside the machine. PVA Inc. should have provided warnings and instruction that the PVA 350 should either not be utilized with dangerous chemicals -- and a more robust model would be more suitable for use at Space X; or the end user must use breathing protection during its setup modes.

It is my opinion that PVA Inc. was negligent in the manufacture, design, testing, warnings, sale, and service of the PVA Inc. 350. As PVA Inc. knew, the PVA 350 Inc. lacked various safety features, PVA Inc. failed to adequately train and warn end users of the danger in their operation manual, during training sessions, or on the machine itself. Further, PVA Inc. knew how Space X was utilizing the machine and the chemicals used during the conformal coating process, but PVA Inc. failed to provide sufficient safety features or warn of the danger and thus the PVA 350 facilitated and caused the exposure to toxic chemicals and resulting injuries.

It is further my opinion that the PVA 350 was defective because it lacked adequate warnings and the only warning on the device pertained to a voltage hazard. Specifically, there needed to be a warning of the risk of serious injury if an end user uses this machine with toxic chemicals such as those used in SpaceX's conformal coating process. Further, PVA Inc. failed to adequately design and train its employees -- and hence its end users -- how to safely utilize the bypass system. PVA Inc. failed to equip the PVA 350 with design protections, and failed to warn users how to safely operate the machine. It was clearly foreseeable that end users such as those in the Avionics industry would utilize the PVA 350 with toxic chemicals utilized in the conformal coating process, and PVA Inc. was aware of the specific chemicals being utilized by Space X as stated in emails/Declarations. A hardcopy set of instructions should have been available locally on or near the PVA350 machine.

## **V. Index of Attached Exhibits of Supporting Material**

1. Attached as Exhibit 1 is a copy of my CV.
2. Attached as Exhibit 2 is a list of cases where I provided trial testimony in the past four years.

# EXHIBIT 1

**GLEN STEVICK, Ph.D., P.E.**  
**Mechanical Engineer, Principal**

**SUMMARY**

Dr. Stevick has over 35 years of experience in failure analysis, design, fracture mechanics and risk assessment of: structures; stadium roofs; industrial equipment; medical devices such as aortic stents, hip and knee implants and spinal rod implants; turbines and reciprocating engines; automotive and aircraft components; offshore platforms for wind generation and oil exploration; pressure vessels and piping systems; blowout and breakaway devices; and heat exchangers and furnaces. Engineering design projects have involved testing and mathematical analysis of electronic control and hydraulic control systems; fire causation, spread and mitigation; explosion causation and prevention systems; structural dynamics and mitigation devices; material behavior improvement; heat transfer and structure/fluid interaction; and the development of medical cauterizing forceps, powerline detection systems, MRI for pipe corrosion detection, PWM motor controllers, 3D scanners and a new product development group working on a variety of consumer and medical products.

**SELECT INDUSTRY EXPERIENCE**

Milwaukee Stadium roof failure analysis and redesign. Deepwater Horizon Investigation. San Bruno pipeline fracture investigation for the Office of the Governor and the CPUC. Stress and fracture analysis of Bigge's D125 15 million pound capacity crane. Submarine drive system analysis for the US Navy. Consultant to the Golden Gate Bridge District for several retrofit projects. Fracture analysis of the first tension leg platforms for Chevron Corp. Blowout and Breakaway Devices for Chevron and Tesoro. Fracture control plans for Conoco's refinery structures. Alaska Pipeline fracture control plans for the pipeline operator Alyeska and the Bureau of Land Management.

**EDUCATION**

Ph.D. Mechanical Engineering, University of California, Berkeley  
M.S. Mechanical Engineering, University of California, Berkeley  
B.S. Mechanical Engineering, Michigan Technological University

**PROFESSIONAL AFFILIATIONS**

Registered Mechanical Engineer, State of California, Nevada, Texas, Louisiana  
American Society of Mechanical Engineers  
Society of Forensic Engineer and Scientists  
Member of ASTM Committees: E05, E08, F15.1, and F15.10

**PROFESSIONAL EXPERIENCE**

**1986 – present**

*Principal, Consultant, Berkeley Engineering And Research, Inc.*

Provide consultation in the areas of failure analysis, design, fracture mechanics and risk assessment, including analysis of codes and standards, medical devices and industrial equipment. Failure analysis work has varied from assessing the failure of cranes, medical implants, bone fractures, ladders, chairs,

industrial presses, aircraft turbine engines, and propane/natural gas equipment and electronics to the analysis of defective safety devices on compressor/heat exchanger systems and fire investigation. Design projects have included the redesign of an electrohydraulic, variable position hospital bed for burn victims; medical implants (spine rod, heart valve, aorta insert, pacemaker, hip, knee and fatigue design); the design of a powered wheelchair that provides standing and sitting positions; the analysis and redesign of high temperature/high pressure piping and pressure vessels; the design of fire safe storage vaults for electronic media; dynamic damping devices for tall structures and bridges subject to wind and earthquake loading; the redesign of pistons and valves for high pressure hydrogen compressors; and electronic sensors for structural health monitoring.

Fire investigation, electrical, and combustion analysis cases have included the evaluation of over 200 home fires; dozens of propane and natural gas fired equipment fires, including barbecues, heaters, furnaces and cooking appliances; refinery, chemical plant, power plant and coal processing plant fires and explosions; and the evaluation of fuel containers, including propane tanks, charcoal lighter fluid cans, and gasoline containers from 1 gallon consumer containers to tanks containing thousands of gallons. More than 200 gasoline fire and explosion tests have been conducted at BEAR as well as hundreds of magnetic field, electric field and spark tests. Design projects have included the design and evaluation of hydrocarbon handling equipment (towers, tanks, pumps, compressors, piping, valves, heat exchangers and furnaces), burner and flow modeling, leak detection methods for tanks, flame arrestors for storage, relief and vapor recovery systems, and burn/spark/fire resistant cauterizing forceps for surgery.

#### **8/90 - 1/91**

*Mechanical Engineering Instructor*, University of California, Berkeley

Instructor for the Department's senior design course: ME-102B, "Mechanical Engineering Design". Conducted lectures on the design of bolted joints, springs, gears, bearings, chain drives, wire ropes, and other mechanical components. Guided students through a major design project.

#### **3/82 - 1/89**

*Engineering Mechanics Specialist*, Chevron Corporation

Handled highly technical projects and provided technical consultation to field engineers in the areas of failure analysis and design. Projects included the redesign of compressor and turbine components, and the design of processing equipment for service temperatures above 1400 degrees Fahrenheit. Consultation varied from giving design advice on how to avoid structural vibration to calculating crack growth rates for offshore platforms in the North Sea.

#### **9/81-3/82**

*Project Engineer*, Chevron USA Production

Responsibilities included the design, and construction management of oil/water separation plants and gas recovery plants in the Bakersfield and Colinga oil fields.

#### **PATENTS**

"Thermo-electric Container" for heating and cooling liquids, G.R. Stevick and H. Sherback, US6119461, September 19, 2000.

"Method and Apparatus for Detecting and Monitoring Oil Spills and Leaks," by Jerome Singer, and Glen Stevick, US9279738 B1, March 8, 2016.

"Method and Apparatus for Magnetic Response Imaging," J. Singer, and D. Rondinone, G.R. Stevick, J. Zalabak, US8395376 B2, May 24, 2012.

"Method and Apparatus for Dynamic Space-time Imaging System" G.R. Stevick, D. Rondinone, J. Singer, A. Sagle, US7961912 B2, June 14, 2011 (continuation of US7620209).

"Method and Apparatus for Dynamic Space-time Imaging System" for creating a 3D map of the surface contours, J. Singer, G.R. Stevick, D. Rondinone, M.D. Rocklin, US7620209 B2, Nov 17, 2009.

## **PUBLICATIONS AND SELECTED REPORTS**

Nemire, K., Stevick, G., and D. Xu, "Forensic Evaluation of a Hazardous Household Product." *Ergonomics in Design*, 25(2) (2017) 15-24.

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Stevick, G.R. "Vapor Recovery Piping – Taft Sec. 36B," *for* Chevron Engineering Department, Aug. 1984.

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Stevick, G.R. "Platform Grace Gas Pipeline – Ductile Fracture," *for* Chevron Engineering Department, 2 April 1984.

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# **EXHIBIT 2**



## TESTIMONY LIST

**GLEN STEVICK, Ph.D., P.E.**  
*Mechanical Engineer, Principal*

### DEPOSITIONS

10/29/2018 (D)

18-4664G IMS Whitewater West v Pacific Surf Designs, United States District Court, Southern District of California, Case No. 3:17-CV-01118-BEN-BLM. Patent infringement.

09/20/2018 (D)

16-4270G McKnight v GM, United States District Court, Southern District of New York, MDL No. 2543 1:14-MD-2543-JMF, Civil Action No. 1:18-cv-03247. Ignition switch.

08/20/2018 (D)

18-4748G Duross v Home Depot USA, United States District Court, Central District of California, Case No. 2:17-cv-07006 SJO (JPRx. Propane tank.

08/16/2018 (D)

18-4721G WhiteWater West v Alleshouse, United States District Court, Southern District of California, Case No. 3:17-CV-00501-DMS(NLS). Sheet wave water ride, patent.

07/16/2018 (D)

18-4685G Winter v Prince Lionheart, Inc., Superior Court of California, County of Riverside, Case No. RIC1722743. Potty seat.

07/11/2018 (D)

16-4270G General Motors LLC Ignition Switch Litigation, Economic loss, United States District Court for the Southern District of New York, 14-MD-2543 (JMF).

07/05/2018 (D)

17-4544G Dardini v Sunshine Vapor, Circuit Court of the 7th Judicial Circuit, Volusia County, Florida, Case No.: 2016-10220-CIDL (02). E-cigarette, battery explosion.

06/21-22/2018 (D)

18-4689G Team WorldWide Corporation v Wal-Mart Stores, Inc., et al, United States District Court, Eastern District of Texas, Marshall Division, Case No. 2:17-CV-0235-JRG. Patent infringement, airbed/pump.

06/04/2018 (D)

17-4577G Lasarte v Custom Performance et al., Superior Court of the State of California, County of Los Angeles, No. BC514465. Nitrous oxide explosion.

05/28/2018 (D)

**Testimony List continued**

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18-4727G IMS Cap Export, LLC v Zinus, Inc., United States District Court, Central District of California, Case No. 2:16cv-00371. Bed, patent.

03/22/2018 (D)

17-4544G Dardini v Sunshine Vapor, Circuit Court of the 7th Judicial Circuit, Volusia County, Florida, Case No.: 2016-10220-CIDL (02). E-cigarette, battery explosion.

03/20/2018 (D)

17-4514G Hoskinson v Yuanda, Superior Court of California, County of San Francisco, Case No. CGC-15-549627. Strapping failure.

03/10/2018 (D)

17-4418G Forensis Littlefield v Nutribullet, United States District Court, Central District of California, Western Division, Case No. 2:16-cv06894 MWF SSx. Pressure cooker, Explosion.

01/29/2018 (D)

16-4351G Valve Corporation v Ironburg Inventions, United States Patent and Trademark Office, Patent and Trial Appeal Board, Case IPR2017-00858, Patent 9,289,688. Video controller, patent.

01/18/2018 (D)

17-4559G Shumate v GM, Circuit Court of Conway County, Arkansas, Second Division, Case No. 15-CV-2015-073. Ignition switch, auto collision.

01/08/2018 (D)

16-4270G GM Ignition Switch Litigation, MDL 2543 Economic Loss, United States District Court Southern District of New York, Case No. 14-MD-2543 (JMF). Ignition Switch.

12/28/2018 (D)

16-4334G Ann Marie Harkins v Pick Five Imports, Case Number 8:16-cv-02362 MSS-MAP. Pressure cooker, explosion.

12/14/2018 (D)

17-4465G Dominic Vargas v Fisher Scientific Company, United States District Court, District of Colorado, Civil Action No. Alcohol container explosion.

11/30/2017 (D)

15-3989 Hubbard v Gates et al., Superior Court of California, County of Sacramento, Case No.: 34-2014-00167568. Axle failure.

11/14/2017 (D)

16-4188G Kyle & Betty Davis v Trane, United States District Court, District of Colorado, Case No: 2:15-cv-11125. Chiller tip-over.

10/03/2017 (D)

16-4351G Ironburg Inventions v Valve Corporations, United States District Court, Northern District of Georgia Atlanta Division, Civil Action No. 1:15-cv-04219-TWT. Video controller, patent.

**Testimony List continued**

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09/06/2017 (D)

16-4351G Valve Corporation v Ironburg Inventions, United States Patent and Trademark Office, Patent Trial and Appeal Board, Ltd., Case IPR2017-00137, Patent 9, 089, 770. Video controller, patent.

08/09/2017 (D)

16-4342D Grubbs v Scepter, State of South Carolina, County of Barnwell, No. 2016-CP-06-00150. Gasoline container explosion.

07/05/2017 (D)

17-4397G David Hoffman v Lightning Vapes, LLC, Superior Court of California, County of San Diego, No. 37-2015-00037760 CU-PL-CTL. E-cigarette, battery.

06/24/17 (D)

16-4229 Flowrider v Pacific Surf Designs, United States District Court, for the Southern District of California, Case No. '15CV1879AJB BLM. Patent infringement.

05/24/17 (D)

16-4270.10 Dodson v GM, United States District Court, Southern District of New York, Case No. 14-MD-2543 (JMF). Ignition switch.

05/02/17 (D)

16-4270 GM People of the State of California, ex rel. Orange County District Attorney Tony Rackauckas v. General Motors LLC, Superior Court of California for Orange County, Case No. 30-2014-007310380CU-BT-CXC. Ignition switch.

04/10/17 (D)

15-4091 Kussman v Hammer & Steel, Superior Court of the State of California, County of Orange, Case No. 30-2014-00754098-CU-PL-CJC. Sheet pile chain.

03/22/17 (D)

15-4016 Halliburton Legacy, United States District Court, Southern District of Texas, Houston Division, Civil Action No. 4-14-cv-02081 (Lead case).

03/09/17 (D)

16-4351 Ironburg Inventions v Collective Mind Gaming Co., United States District Court, Northern District of Georgia, Civil Action No. 1:16-cv-4110. Patent infringement.

03/02/17 (D)

14-3729G Mireles v Phillips 66, Superior Court of the State of California, County of Los Angeles, South District, Case No.: BC503381. Propane explosion.

02/24/17 (D)

16-4270, Cat A, Ward v GM, General Motors, United States District Court, Southern District of New York, Case No. 1:14-cv-08317. Ignition switch.

01/27/17 (D)

16-4330 Kinn v Cahill, Superior Court of the State of California, County of San Francisco, Unlimited Jurisdiction, Case No.: CGC-14-537814. Carbon monoxide.

**Testimony List continued**

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01/19/17 (D)

14-3749 Myers v Polar, Superior Court of California, County of Sacramento, Case No. 34-2014-00162383. Tanker slip.

12/09/16 (D)

16-4270 General Motors LLC Ignition Switch Litigation: Ruby Greenroad and Vivian Garza, United States District Court Southern District of New York, No. 14-MD-2543 (JMF). Ignition switch.

11/15/16 (D)

Lee v Aspen et al., District Court of Clark County, Nevada, Case No.: A-13-676550-D, Dept. No.: 16. HVAC unit.

10/26/16 (D)

15-3949 Trepte v Bionaire, Superior Court of the State of California, County of Los Angeles, Central Civil West District, Case No.: BC540110. Heater.

10/21/16 (D)

15-3950 General Motors, LLC. Ignition Switch Litigation, United States District Court, Southern District of New York, Case No. 14-MD-2543 (JMF). Ignition switch.

09/13/16 (D)

Costa v Tamalpais, Superior Court of the State of California, County of Main, Case No. CIV 1404441. Garbage truck, bolt.

08/25/16 (D)

15-3972 Thatcher v Wal-Mart, Circuit Court of Benton County, Arkansas, Civil Division, Case No. CIV CV2015-360-5. Gasoline container explosion.

08/18/16 (D)

16-4232 PG&E v South Sutter LLC, Superior Court of California, County of Sutter, Case No. CVCS 14-2376. Pipeline.

08/16/16 (D)

12-3438.1 Stanton/ Turner v Richmond American Homes, Aspen, et al., District Court, Clark County, Nevada, Case No. A-13-689790-D. HVAC unit.

07/27/16 (D)

15-4089 Herbert v Ford et al., Superior Court of the State of California, County of San Bernardino, West Valley Branch, Case No. CIV DS1415915. Seat belt, automobile accident.

07/11/16 (D)

15-3970 Wurster vs The Plastics Group, United States District Court, Southern District of Iowa, Civil Action No. 4:14-CV-503. Gasoline container explosion.

06/16/16 (D)

09-3043 Regents of the University of California v Factory Mutual Insurance, Superior Court of California, San Francisco County. Case No. CGC-13-534008. Piping.

**Testimony List continued**

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06/06/16 (D)

15-3952 Nunez-Aguirre v JD Systems, LLC, Superior Court of the State of California, Orange County, Case No. 30-2014. Scaffolding.

05/11/16 (D)

16-4201 PG&E v McKenzie Farms, Superior Court of the State of California, Case No. CVCS 15-0195.

04/20/16 (D)

14-3832 TREWS Worldwide Oilfield v Ameriforge, United States Patent and Trademark Office, Case IRP2015-00233. BOP patent.

03/17/16 (D)

15-3950 Robert Scheuer v General Motors LLC, United States District Court, Southern District of New York, 14 Cv. 8176 (JMF). Ignition Switch, SDM, airbag.

02/09/16 (D)

12-3438 Seasons v Richmond America, District Court, Clark County, Nevada, Case No. A676550A, Dept XVI. HVAC system design.

01/28/16 (D)

12-3456 Lincoln Punch v Dollar Tree Stores, Inc., United States District Court, Western District of Pennsylvania, Case No: 1:12-CV-154-SPB. Tweezers, battery ingestion.

01/05/16 (D)

14-3850 Rukse v Wal-Mart, United States District Court for Northern District of Florida, Pensacola Division, Case No.: 3:14-cv-00236-MCR-EMT. Gasoline container explosion.

11/24/15 (D)

15-3950 GM Ignition Switch Case, United States District Court, Southern District of New York, 1:14-MD-02543 (JMF). Ignition switch, SDM, airbag.

11/04/15 (D)

15-3959 Montgomery v Wal-Mart, United States District Court, Southern District of California, 3-12-cv-3057-JLS-DHB. Gasoline container explosion.

10/06/15 (D)

15-3959 Montgomery v Wal-Mart, United States District Court, Southern District of California, 3-12-cv-3057-JLS-DHB. Gasoline container explosion.

09/30/15 (D)

15-3950 GM Ignition Switch Case, United States District Court, Southern District of New York, 1:14-MD-02543 (JMF). Ignition switch, SDM, airbag.

09/28/15 (D)

15-3950 GM Ignition Switch Case, United States District Court, Southern District of New York, 1:14-MD-02543 (JMF). Ignition switch, SDM, airbag.

**Testimony List continued**

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07/25/15 (D)

14-3831 Skedco v Strategic Operations, United States District Court, District of Oregon, 3:13-CV-009968-HZ. Hemorrhage training system patent.

06/15/15 (D)

14-3819 Fleet v Safety Line, Superior Court of CA, Alameda County, HG-10540587. Rope access equipment.

06/09/15 (D)

13-3636 Catalyst v Burdett, District Court County, Nevada, A-11-632718-C. Press brake, foot switch.

05/05/15 (D)

09-3043 UCSF PUP Piping, Superior Court of CA, San Francisco County, CGC-13-534008. Piping.

04/27/15 (D)

14-3877 Shop-Vac Marketing & Sales Litigation, Superior Court of New Jersey, Law Division, Bergen County, BER-L-1399-12. Shop-Vac claims.

02/11/15 (D)

14-3831 Skedco v Strategic Operations, United States District Court, District of Oregon, Case No.: 3:13-cv-00968. Hemorrhage training system patent.

02/5/15 (D)

14-3877 Shop-Vac Marketing & Sales Litigation, Superior Court of New Jersey, Law Division – Bergen County, BER-L-1399-12. Shop-Vac claims.

01/26/15 (D)

14-3884 Forensis Marine Travelift, Inc. v Ascom, United States District Court, Eastern District of Wisconsin, 1:14-CV-443-WCG. Control system patent.

11/13/14 (D)

14-3844 TASA Albers v Solar City, Superior Court of CA, County of Los Angeles, BC537831. Pool filter explosion.

09/26/14 (D)

14-3723 Roitman v ATG Rehab, Superior Court of CA, County of Los Angeles, Southeast District, Norwalk, VC060199. Walker.

09/19/14 (D)

14-3802 Regalado v Callaghan, Superior Court of CA, Riverside County, Palm Springs Court, INC1203669. Propane explosion.

09/12/14 (D)

14-3796 Forbush v Sagecret, District Court of the State of Texas, County of Cameron - 107th Judicial District, 2011-DCL-3561. Carbon dioxide, water heater.



**Testimony List continued**

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09/8/14 (D)

14-3799 Sonicare Toothbrush Litigation, United States District Court, Western Division of Washington, 2:13-cv-00518-MJP. Toothbrush.

05/21/14 (D)

11-3298 Ordaz v Ohi Company, et. al., Superior Court of CA, County of San Joaquin, 39-2011-002644263-CU-PL-SRK. Conveyor belt, arm amputation.

05/19/14 (D)

13-3687 Satterfield v Napa Home & Garden et. al., United States District Court, South Carolina, Spartanburg Division, 7:11-CV-01514-MGL. Fire pot explosion.

02/25/14 (D)

11-3306 Procknow v Wabash, Superior Court of CA, County of San Francisco, CGC-11-511648. Break press, amputation.

**COURT TESTIMONY**

08/31/2018 (C)

17-4533G Haro v Haro, Superior Court of the State of California, County of Sonoma, No. SFL-76272. Furnace.

07/21/2018 (C)

17-4577G Lasarte v Custom Performance et al., Superior Court of the State of California, County of Los Angeles, No. BC514465. Nitrous oxide explosion.

11/28/2018 (C)

17-4515G Duran v DynaTen, Case No. CC-15-04157-E, At Law No. 5, Dallas County, Texas. Flange, explosion.

07/13/2017 (C)

16-4270G Ward v GM, United States District Court, Southern District of New York, 14-MD-2543 (JMF) Case No. 1:14-cv-08317. Ignition switch, Auto Collision.

04/05/17 (C)

15-3970 Wurster vs The Plastic Group, The U.S. District Court, Southern District of Iowa, Central Division, Case No. 4:14-CV-503. Gasoline container explosion.

02/08/17 (C)

15-4089 Herbert v Ford, Superior Court of the State of California, County of San Bernardino – San Bernardino Justice Center, No CIV DS1415915. Seat belt.

11/10/16 (C)

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**Testimony List continued**

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15-3972 Thatcher v Wal-Mart, Circuit Court of Benton County, Arkansas, Civil Division, Case No. CIV CV2015-360-5. Gasoline container explosion.

03/17/16 (C)

16-4180 Barthelemy v General Motors LLC, U.S. District Court, Southern District of New York, No. 1:14-cv-05810. Ignition switch.

01/15/16 (C)

15-3950 Robert Scheuer v General Motors LLC, United States District Court, Southern District of New York, 14 Cv. 8176 (JMF). Ignition switch, airbag, SDM.

09/29/14 (C)

14-3802 Regalado v. Callaghan, Pentair, et al., Superior Court of CA, Riverside County, 1203669. Propane explosion.

07/18/14 (C)

14-2755 Certain Multiple Mode Outdoor Grills and Parts Thereof, United States International Trade Commission, Washington, D.C., 337-TA-895. Grill design.

EXPERT REPORT OF  
EDWARD FAEDER PH.D.



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## **Preliminary Review of Work-Related Exposure of Ruben Juarez to Chemicals from a PVA 350 Coating Machine Utilized at Space Exploration Technologies**

### **I. INTRODUCTION**

SRF Environmental and Health Management Inc. was retained by Balaban & Spielberger LLP to assess this case toxic exposure involved in this case as a result of the defective design and warnings of a PVA 350 coating machine (serial number W3267) utilized at Space Exploration Technologies by Ruben Juarez during his employment from 2012 to March 26, 2014, which caused toxic exposure to the following chemicals and products: Arathane<sup>®</sup> 5750A, Arathane<sup>®</sup> 5750B, Arathane<sup>®</sup> 5750A/B, Humiseal<sup>®</sup>, Humiseal<sup>®</sup> thinner 521, and isopropyl alcohol ("IPA").

### **II. BACKGROUND/QUALIFICATIONS**

I am President and Principal Scientist of SRF Environmental and Health Management, Inc. (SRF). I have almost 48 years of experience in environmental, health and safety management, and developing and conducting environmental and health-related research.

I have been responsible for providing a wide range of health protection services to clients of SRF. I have worked for electric utility, school district, secondary metals, paper, aerospace, pharmaceutical device research and manufacturing, oil refining and fuel production, rubber tire, coal mining, health care and hospital, food production, and meat industry clients. I served as the consulting toxicologist for Saugus Union School District's indoor air quality program performing a complete evaluation of the use of portable classrooms within that school district, resulting in the public presentation of more than 18 reports regarding the safety of those rooms. I have additionally assisted other school districts in California in areas relating to indoor air quality and the effects of wild fires and outdoor exposures on children and faculty. I have operations and manufacturing, analysis experience, and direct plant level experience in developing and implementing health and safety compliance programs. I have performed environmental, health and safety

compliance programs. I have performed environmental, health and safety management analyses, health and safety facility audits, and detailed chemical and toxicological analyses of specific work place and community chemical exposure concerns, including complex risk assessments and risk communication for multiple clients. I have assisted clients in developing and implementing programs aimed specifically at insuring U.S. OSHA, EPA, and other regulatory agency compliance, especially state agency compliance in California, and trained personnel in their implementation.

I was previously Senior Vice President for The Jefferson Group, a Washington, D.C.-based governmental relations consulting firm, and was responsible for developing a business base in the western United States. He developed an environmental, health and safety management auditing practice, while with that company.

Prior to joining The Jefferson Group, I served as the first Director of Environmental Protection and Safety for the Lockheed Aeronautical Systems Company. I organized and established an environmental, health and safety organization at Lockheed that became a model in the aerospace industry. I dealt with major and complex environmental, health and safety challenges, including multi-million-dollar negotiations and settlements with OSHA and EPA, during my tenure with Lockheed.

I also served as Director of Environmental and Health Sciences at ICF-Clement Western Operations, a national environmental consulting firm, where he was responsible for review and oversight of health-based risk assessments at a number of EPA Superfund sites. I spent eleven years at Southern California Edison Company managing Environmental Operations, and Environmental Research Divisions, as well as five years with the United States Environmental Protection Agency performing health effects research.

I have written and presented numerous technical and management analysis papers concerning environmental issues and served as an expert witness regarding chemical exposure and effects on people. I have considerable experience in the planning and conduct of health-based risk assessments for both environmentally contaminated site exposures and work place exposure of personnel and have evaluated health and safety-based risks for a wide variety of clients in both indoor and outdoor milieu.

I earned a Ph.D. in Biophysical Chemistry from Cornell University and a B.A. in Chemistry from Columbia College. I have served on the faculty of the School of Public Health at UCLA as an Adjunct Associate Professor and taught environmental toxicology in the University's Extension Program. I was a California Registered Environmental Assessor (REA-00046) prior to the closure of that program by Cal EPA, and am a Qualified Environmental Professional (No. 05960083), Institute of Environmental Professional Practice), a Fellow of the American Institute of Chemists, and a Fellow of the American College of Forensic Examiners (No. 3135).

A true and correct copy of my resume is attached to this report as **Exhibit 1**.

### **III. MATERIALS REVIEWED AND KNOWN TO DATE**

My opinions are given in the following paragraphs based upon my personal involvement in the investigation of the subject incident, including my review of relevant records, deposition transcripts and photographs of the physical evidence. All of my opinions rendered in this report are made with a reasonable degree of scientific certainty. This report does not contain all of the opinions that I hold in this case and I reserve the right to supplement my opinions, if and when, additional information becomes available. In formulating my opinions, I specifically have reviewed the following materials: the reports from the workers compensation toxicologists, records, discussions with Plaintiff, the deposition of Ruben Juarez as well as all exhibits including brochures, comparison charts, and the PVA Inc. promotional materials, videos of conformal coating process, video of the demonstration in April at PVA Inc. of the conformal coating process, the declarations submitted in support of PVA Inc.'s Motion for Summary Judgment as well as the supporting exhibits, and the Declarations in Support of Plaintiffs' Opposition to the Defendant's Motion. An index of supporting material referring to the Exhibits referenced is set forth herein.

### **IV. FACTS**

It is undisputed that PVA Inc. manufactured, designed, and sold a machine, the PVA 350, to Space X in 2009. Ruben Juarez worked at Space X from January 2012 to May or June 2014 as a programmer and also worked as a technician for some time. While working at Space X, Ruben Juarez started to experience various health problems including headaches. A physician initially suspected Mr. Juarez had vertigo and later suspected his aneurysm was the cause of his condition. Only

after a successful surgery in 2013 and subsequent checkups did Mr. Juarez realize that he had recovered from the aneurysm. But because Mr. Juarez' symptoms persisted, he realized the aneurysm was not causing his symptoms. As Mr. Juarez pointed out no one else at work was sick, Mr. Juarez thought his symptoms were caused by his aneurysm or because he was just unusually sensitive to the chemicals in the nearby chemical baths.

Mr. Juarez' Workers Compensation Claim was filed due to "repetitive and continuous exposure to electronics parts cleaning (the chemical bath down the hall) and Lead SO (the filters with the lead wiring). At this time, Mr. Juarez guessed that the cause of his injuries was lead solder wires and unknown chemicals used in the chemical cleaning baths at the Space X facility—items and areas completely unconnected to the PVA 350.] At the time Mr. Juarez filed his Workers Compensation Claim, there were no physicians who suggested Plaintiff examine other chemicals utilized at Space X to which he might have been exposed — there were no physicians telling Plaintiff to avoid anything or any place at work — there was no one informing Plaintiff that the PVA 350 was not hooked up properly, working properly, or that it was dangerous to program the PVA 350 without preparation — Plaintiff did NOT see any material safety data sheets ("MSDSs"), updated safety data sheets (SDSs"), machine manuals associated with the PVA 350—nor did Plaintiff see any Standard Operating Procedures issued by his employer regarding the use of MSDSs/SDSs and/or the use of the PVA 350, based on the declaration he has submitted to date.

During the work up of Mr. Juarez' Workers Compensation claim, he was sent to see Dr. Regev. Dr. Regev suggested that Mr. Juarez obtain the MSDSs for the lead solder wire and chemical cleaning baths. During this appointment, Dr. Regev never indicated Mr. Juarez thought any of the chemicals he was working with were dangerous, and Dr. Regev did not tell Mr. Juarez to stay away from any chemicals.

Pursuant to Dr. Regev's request (i.e. following the doctor's advice), Plaintiff requested the MSDSs and made an appointment with a medical toxicologist. Mr. Juarez also called Space X and requested a list of chemicals associated with the chemical bath and the filters with the lead wires. Space X did not meet that request, nor provide Mr. Juarez with a list, so Mr. Juarez called Francisco (a co-worker at Space X) in early March of 2015 and Francisco ended up giving Mr. Juarez not only the list of chemicals involved in the cleaning baths and lead wire, but also the names of the chemicals that Mr. Juarez worked with when programming PVA 350.

Mr. Juarez emailed Space X on March 3, 2015 asking for the MSDSs for the chemicals that Francisco indicated that Mr. Juarez worked with. And, on March 3, 2015, Jane Malubag, with Space X, did not send Mr. Juarez the MSDSs but rather



indicated Space X's insurance would send them directly to Mr. Juarez' workers' compensation attorneys. On March 12, 2015 she indicated that the MSDSs were forwarded to Mr. Juarez' attorney and insurance company.

After receipt of the MSDSs, Mr. Juarez saw a medical toxicologist on March 25, 2015, Dr. Zlotolow M.D., and provided Dr. Zlotolow with the MSDSs for his review. It was at the appointments with the medical toxicologist, starting in March 2015 that Plaintiff was first told his reactive airways disease and rhinitis were probably caused by industrial chemical exposure on the job. Only after Mr. Juarez reviewed the MSDSs did Mr. Juarez realize that the solder wire was lead-free, and the chemical used in the chemical baths was only isopropyl alcohol. Plaintiff was deposed on three occasions during the Workers Compensation Action—March 30, 2015, May 20, 2015, and October 21, 2015. During these depositions, counsel for Space X continued to ask questions to the Plaintiff about the PVA 350 — the way Plaintiff operated the PVA 350 — the training Plaintiff received about the PVA 350, and about any warnings associated with the PVA 350. It was this series of questions which led Plaintiff to investigate the safety of the PVA 350 and which triggered Plaintiff's actual suspicion that his injury was might have been caused by defects associated with the PVA 350.

For years, Mr. Juarez worked with the PVA 350, not questioning whether Space X or PVA Inc. were omitting safety information or training information necessary for him to safely perform his work in the vicinity of the machine. He was *never* provided the operating manual. A new chemical material, which Mr. Juarez later found out was toxic, Arathane<sup>®</sup>, was introduced at Space X with the assistance of PVA Inc., and David Hwang replaced the original chemical, which Mr. Juarez later found out was Humiseal<sup>®</sup>. Mr. Juarez had no formal or informal chemistry training, so he was not allowed to mix these chemical compounds and he was unaware of the toxicity of the chemicals since he was never trained on their use, nor given materials warning of their toxicity.

I am not a medical toxicologist, nor a physician. I do not diagnose or treat patients. But, as a chemist and chemical toxicologist, based on my review of Mr. Juarez's medical records, reports, and materials produced to date, symptoms that the medical toxicologist reports that Mr. Juarez experienced as a result of the toxic chemical exposure caused by working with and near the PVA 350 are consistent with reported effects of the chemicals in those materials.

#### **IV. OPINIONS AND BASIS**

Mr. Juarez worked on machine PVA 350 machine (Serial Number W3267), utilizing the following chemicals:



- Arathane<sup>®</sup> 5750A that contains chemicals toluene, diphenylmethane 4, 4'-diisocyanate, MDI Homopolymer, methylenediphenyldiisocyanate ("MDI"), and triethyl phosphate;
- Arathane<sup>®</sup> 5750B that contains chemicals toluene, hydroxylated polybutadiene, methyl ethyl ketone, 1, 1'-phenyliminodipropyl-2-ol
- Arathane<sup>®</sup> 5750A/B which is the mixture of the prior two
- Humiseal<sup>®</sup> that contains chemicals toluene, acetone, xylene, ethyl benzene, methyl ethyl ketone, dimethyl ether, heptane, ethyl 3-ethoxy propionate, and oil modified polyurethane (a proprietary mixture).
- Humiseal<sup>®</sup> thinner 521 EU that contains chemicals xylene (mixed isomers, unspecified, 90-100% by weight).
- Isopropyl Alcohol ("IPA")

Instructions for the use of the machine failed warn users of the hazards associated with two chemicals listed under Proposition 65, toluene and ethyl benzene, as "chemicals known to the State of California to cause reproductive toxicity," a requirement of the law. The supplier of the PVA 350 was negligent in failing to warn, under California law, and see that users of the machine, or those nearby a machine in use, were not exposed to unacceptable levels of the chemicals.

Based on his work record and testimony, and the use of the PVA 350 in enclosed areas with inadequate, or regularly utilized ventilation, Mr. Juarez was exposed to solvents and ingredient chemicals, many times at levels high enough to cause physical discomfort, as documented in his medical reports.

Solvent exposures, especially toluene, ethylbenzene, xylene(s), acetone, methyl ethyl ketone, and isopropyl alcohol undoubtedly caused irritation, discomfort, and sequelae was described by the medical toxicologist. Some are capable of neurotoxic effects, as well.

The associated MSDSs reveal a picture of health effects that could be chronic, with sufficient exposure to these chemicals. The MSDS of Arathane<sup>®</sup> 5750A provides information that the chronic health effects from the exposure "can cause target organ damage" that include the "upper respiratory tract," "the nervous system . . . brain, central nervous system (CNS)." The MSDS of Arathane<sup>®</sup> 5750B provides information that the chronic health effects of exposure to toluene "can cause target organ damage" including "the nervous system . . . brain, gastrointestinal tract, central nervous system (CNS)." Over-exposure will aggravate the medical conditions. The MSDS of Humiseal<sup>®</sup> provides information that inhalation of the

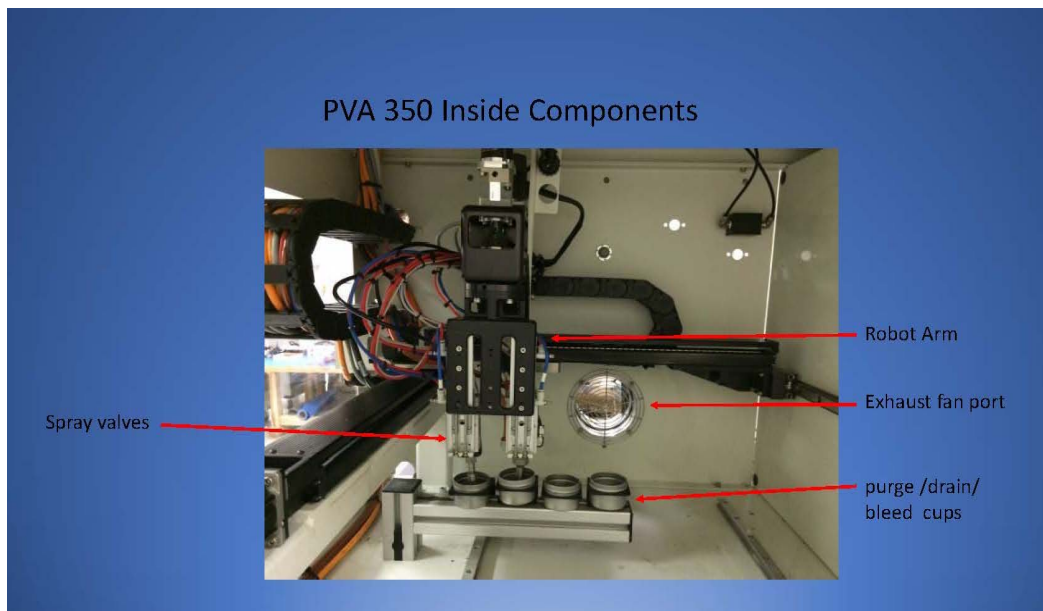
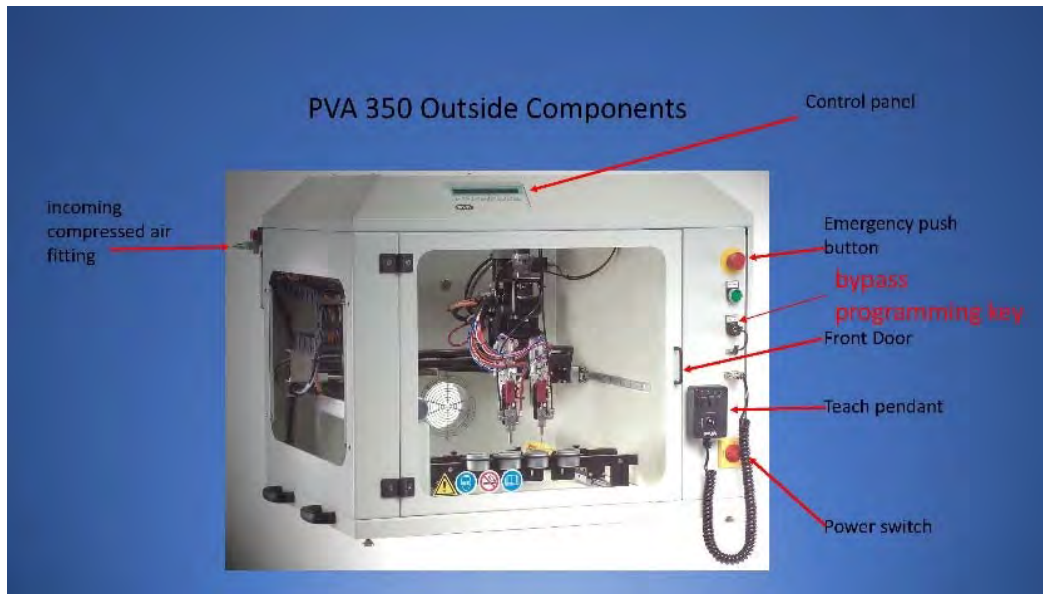
chemicals can “[c]ause irritation of nasal passages and throat” and “stupor (central nervous system depression).” “Significant exposure to these chemicals may adversely affect people with chronic disease of the respiratory system” and “central nervous system.” An inhalation may “cause mild nausea/dizziness.” The MSDS of Humiseal® thinner 521 EU provides “[s]ignificant exposure to these chemicals may adversely affect people with chronic disease of the respiratory system [and] central nervous system.” Inhalation may cause nausea/dizziness. Similarly, the MSDS of IPA provides that prolonged exposure may result in nose, throat, and central nervous system depression. “Acute CNS depression may be manifested as giddiness, headache, dizziness, and/or nausea.”

It is also well documented that prolonged exposure to these chemicals is hazardous. For example, the Centers for Disease Control (“CDC”) publishes that the “most common route of exposure of [toluene] is via inhalation. Symptoms of toluene poisoning include central nervous system effects (headache, dizziness, ataxia, drowsiness, euphoria, respiratory depression, nausea, electrolyte imbalances).” [Detailed description in the latest June 2017 ATSDR Toxicity Profile for Toluene, Toluene, ATSDR Health Effect, pp. 132-161)

Similarly, symptoms from exposure to MDI include “headache, sore throat . . . chest tightness.” (Methylenediphenyl diisocyanate – 6) A study of 203 school children who were exposed to MDI shows that 70.9% reported headache, and 62.6% reported nausea. (Id. at p. 7.) The effects of chronic exposure of MDI include “headache, nausea and muscle aches. (Id. at p. 9.) “There are also case reports of neurological effects” of “headaches, forgetfulness, mood alterations, irritability, and difficulty concentrating.” (Id. at p. 10) “[T]here was evidence of emotional distress in the form of depression, anxiety, and altered mentation.” [Id.]

**A. Mr. Juarez Spent About 60% of His Day in Front of the PVA 350 and Often Placed His Head Inside the PVA 350 As Instructed by PVA**

Mr. Juarez started working for Space X on January 12, 2012. The main part of his job was to program a PVA 350 to ensure correct coverage and thickness of the sprayed chemicals on circuit boards. At the time, Mr. Juarez did not know the toxicity of the chemicals. The following are pictures demonstrating different functions of the PVA 350, inside and outside views.



As part of the programming, in order to check the coverage and thickness of the spray, PVA taught Mr. Juarez that he had to place his head inside the PVA 350. He had to do this because the spray is usually very fine with tiny thickness and therefore, a naked eye cannot identify whether or not certain part of the circuit board has been sprayed or the thickness of the spray. The only way to verify this is to use a black light and place his head inside the PVA 350 to check. He could not take the circuit board out of the PVA 350 to verify this because it is wet and thus, any handling of the board would destroy the accuracy of the spray.

When the exhaust fan is not in operation, Mr. Juarez breathed in the residual chemicals during the verification process because his head was directly emerged

inside the PVA 350 with the non-evacuated chemicals inside. When the exhaust port was not operated, chemical built up in concentration to more harmful levels.

In addition, when the exhaust fan is not in operation, the toxic chemicals leaked out of the PVA 350. Mr. Juarez on average spent about 60% of his days next to the PVA 350. A program generally takes from 2-8 hours depending on the complexity of the program. He also performed trouble shooting of the PVA 350. Trouble shooting generally took at least one hour, depending on the complexity of the problem and variables such as chemical viscosity, temperature, and valve adjustment. In total, he spent about 60% of his days standing in front of the PVA 350.

During his time at PVA from 2012 to 2014, Mr. Juarez had confirmation that the ventilation system was not in operation many times: Mr. Juarez asked his co-worker why it always smelled so bad in the room, the co-worker told Mr. Juarez that he just realized that he had forgotten to turn on the ventilation system. Mr. Juarez did not suspect that the chemicals may have caused his injuries until March of 2015 when he received the MSDS from his employers.

In total, Mr. Juarez worked with the PVA 350 from January 2012 to sometime in May or June of 2014.

#### **V. PUBLICATIONS WITHIN 10 YEARS**

**Please see resume, Exhibit 1.**

#### **VI. LIST OF CASES TESTIFIED TO IN THE PAST FOUR YEARS**

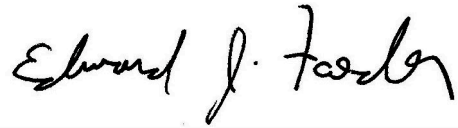
**Attached as Exhibit 2**

#### **VII. COMPENSATION**

My compensation for the time spent away from my practice to participate in litigation for both defense attorneys and plaintiffs' attorneys is at the rate of \$395.00 per hour, \$450 for deposition testimony per hour, and \$3,600 for a day of trial testimony.

Attached as Exhibit 1 is a copy of my CV.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 29, 2018, in Diamond Bar, California.

A handwritten signature in black ink, reading "Edward J. Faeder". The signature is written in a cursive style with a large, stylized 'E' and 'F'. It is positioned between two light gray rectangular boxes.

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EDWARD J. FAEDER, Ph.D.



SRF Environmental and Health Management, Inc.  
2243 Feather Rock Road  
Diamond Bar, California, 91765  
Telephone: 909-860-8282 e-mail: [efaeder@ix.netcom.com](mailto:efaeder@ix.netcom.com)

## EDWARD J. FAEDER

### Résumé

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#### EDUCATION

B. A., Chemistry - 1965  
Columbia College, New York, New York

Ph. D., Biophysical Chemistry - 1970  
Cornell University, Ithaca, New York

Post Doctorate, Biochemistry - 1972  
Duke University, Durham, North Carolina

#### SUMMARY OF SKILLS

Forty-eight years of experience in high level management, organizational, technical, and policy areas related to environmental protection, health and safety for utilities, school districts, health care and hospital, food production, energy production, and meat industry clients. Government experience, consulting experience, academic and teaching experience. Skill and experience negotiating complex environmental protection and safety agreements with a variety of regulatory agencies, including EPA, OSHA, state and local health departments and air quality management districts. Experience with the approach and impacts of DOE "Tiger Teams." Experience in the development of strategic approaches to complex environmental, health and safety toxic tort litigation. Experience in litigation support, including deposition and trial testimony, for a wide range of environmental, health, and safety related issues, focusing on exposure evaluation and analysis, for both defendants and plaintiffs (roughly two thirds defense and one third plaintiff). Ability to integrate multi-disciplinary approaches into the solution of complex regulatory and health-related problems. Ability to enlist senior management and working group support and participation in solving problems. Ability to work in stressful environments.

#### WORK EXPERIENCE

Present - 1991 Executive Vice President  
SRF Environmental and Health Management, Inc.  
Diamond Bar, California

Assists clients to resolve environmental, health and safety ("EHS") issues cost effectively and in compliance with regulatory requirements. Specializes in organizational analysis and problems to optimize handling EHS activities by corporate and company senior management, and works on specific problems associated with toxic chemicals, hazardous wastes, perform risk assessments, environmental, health and safety audits relevant to the purchase and sale of property. Deals with potential human health problems arising from environmental or occupational exposures. Provides litigation support including strategy development and testimony in toxic torts cases. Recent work in multiple legal cases

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involving real and alleged chemical exposure and injury. Qualified Environmental Professional, Fellow; American Institute of Chemists, Fellow; American College of Forensic Examiners Institute, Fellow; Certified Level II Thermographer (No. 13780).

1991 - 1990 Senior Vice President  
The Jefferson Group  
West Covina, California

Was the Director of The Jefferson Group's Los Angeles-based Environmental and Occupational Health Division. Focus was on providing a wide range of health protection (environmental, health, safety, occupational medical, and emergency response) services to clients. Specialized in working to audit, analyze, and restructure corporate health protection activities so that regulatory compliance could be achieved cost effectively and with appropriate senior management control.

1993 - 1980 Adjunct Associate Professor, Environmental and Occupational Health Sciences Division,  
School of Public Health, UCLA  
Los Angeles, California.

Participated in the development of an integrated departmental program in environmental toxicology; supervised graduate student activities in electric utility industry-related research projects. Currently teach environmental toxicology in the UCLA Hazardous Materials Management Extension Program, and maintain affiliations with the Environmental Sciences and Engineering professional degree program.

1990 - 1988 Director, Environmental Protection and Safety  
Lockheed Aeronautical Systems Company  
Burbank, California.

Was responsible for organizing and directing the Environmental Protection and Safety Branch of Lockheed Aeronautical System Company's Burbank Division. Combined all health, safety, and environmental activities for the company, from three other branches. Professional and regulatory affairs specialists focused on environmental, health and safety, hazardous chemicals, and waste issues for a business unit employing about 15,000 people. Built this group to almost 100 in size, and had responsibility for many health protection issues of importance to the Company. The latter included: An asbestos program for older buildings; solvent usage; airborne toxic chemicals; groundwater contamination and Company participation in a unique area-wide Superfund site involving multiple potentially responsible parties (PRPs); hazardous waste minimization and disposal; toxicological assessment of new chemicals and processes program; management of a major, multimillion dollar occupational health and safety commitment to the U.S. Occupational Safety and Health Administration as part of the settlement of citations against the Company. Used non-traditional, applied research, problem-solving approaches unique within the aerospace industry. Tactical and strategic planning were involved. The Branch operating budget was in excess of \$40,000,000 per year (function plus capital equipment) Managed over 100 health protection specialists.

1987 Director, Environmental and Health Sciences,

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ICF-Clement Western Operations, ICF Technology,  
Los Angeles, California.

Developed and managed ICF's risk assessment efforts in the western part of the United States. Recruitment and staffing, general management of technical personnel, performance as a technical expert in the risk assessment area, development of a marketing strategy for business growth in this area, and its implementation. Supervised nine professionals, at maximum group size. Performed technical and related policy work for private and governmental clients on hazardous waste problems, air toxics issues, environmental site assessments and auditing, risk communication to public groups, and health and safety issues. Provided testimony and work with attorneys to develop technically sound legal strategy in toxics-related cases.

1986 - 1985      Manager of Environmental Operations  
Southern California Edison Company  
Rosemead, California.

Directed the Southern California Edison Company's response to environmental problems arising from their business operations. Managed forty technical and professional people, and a budget of \$8,000,000 in performing these activities. Served as the initial contact and coordinated developmental remedial measures. Provided interface with staff and other key personnel of environmental and regulatory agencies concerning the issuance, amendment or revocation of existing laws, policies or regulations. Developed and implemented environmental compliance programs. Coordinated permitting and licensing with environmental and regulatory agencies. Coordinated responses to requests from regulatory agencies for information on the environmental aspects of Company operations. Provided environmental engineering design and monitoring services for facilities in support of generation project managers and other requesting organizations.

1985 - 1984      Manager, Systems Research and Development  
Southern California Edison Company  
Rosemead, California.

Managed all environmental research activities for the Company, including environmental and occupational health, terrestrial and marine ecology, and atmospheric chemistry. Supervised a group of 33 company and contract professionals in conducting research activities in support of corporate environmental goals. Annual budget was in excess of \$5,000,000. Provided internal and external technical support for corporate line operations and regulatory and licensing processes.

1984 - 1981      Consulting Scientist  
Southern California Edison Company  
Rosemead, California.

Developed research programs in all areas of toxic and hazardous chemical effects on Company employees and people living within its service territory. The program dealt with exposure to chemicals used in Company facilities and wastes generated by business

Edward J. Faeder

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operations. A specific example is the development of a corporate PCB exposure program to characterize worker exposure and effects from using PCBs in a subject population of 2,000 employees. Served as the Company expert in the area of environmental toxicology. Managed the integration of research findings with policy objectives for industry-wide impacts through active participation in utility ad hoc groups, e.g., technical management of EEI/USWAG PCB Project; UARG Health and Welfare Effects Committee participation in SO<sub>2</sub> and NO<sub>2</sub> ambient air standard setting processes. Continued to function as supervisor of Health and Biological Effects Group, containing five professionals.

1980 - 1976 Senior Research Scientist, Supervisor Health and Biological Effects Research  
Southern California Edison Company  
Rosemead, California.

Developed and implemented corporate research program to determine the effects of air pollution on human beings in Southern California; provided technical support for other groups in the Company, particularly Law, and Environmental Affairs in the health effects area; served as Health Effects Coordinator on an industry-wide basis, through Utility Air Regulatory Group Ambient Standards Committee with other companies and provided technical input directly to federal regulatory agencies. Supervised health effects research for the Company and directed work of health and biological effects section of Environmental Systems Group. Annual budget was approximately \$3,000,000. Group contained three professionals.

1976 - 1975 Acting Chief, Biochemical Screening Section, Health Effects Research Laboratory  
U.S. Environmental Protection Agency  
Research Triangle Park, North Carolina.

Directed the development of biochemical and chemical techniques to examine the exposure of animals and people to toxic substances.

1975 - 1972 Research Chemist, Bioenvironmental Laboratory  
Branch, Division of Health Effects Research,  
U.S. Environmental Protection Agency  
Research Triangle Park, North Carolina.

Developed coordinated program to examine effects of gaseous and heavy metal pollutants on biochemical systems in animals. Established extramural contract research program through EPA's Minority Institute Research Support Program.

1972 - 1970 Research Associate, Department of Biochemistry,  
Duke University  
Durham, North Carolina.

Examined the role of metals and co-factors in electron transfer through biological molecules.

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#### **ADDITIONAL EDUCATION**

“Inframation 2010 – Infrared Camera Applications Conference,” conference on infrared cameras, theory and applications,” including 3 one-half day clinics on: building science applications; energy auditing; and infrared camera software techniques; November 24-28, 2010, Las Vegas, Nevada.

“Lead Based Paint Inspector and Risk Assessor Course,” National Association of Training and Environmental Consulting (NATEC International, Inc.), 40-hour certified California Department of Public Health and U.S. EPA curriculum program; passed final class certification exam, March 1 - 5, 2010, Anaheim, California.

“Professional Ethics, Doing What is Right in the Practice of Industrial Hygiene,” AIHA Teleweb Virtual Seminar, August 4, 2009, internet seminar.

“Mold: Exploring, Sampling, Analysis, and Data Interpretation,” AIHA Teleweb Virtual Seminar, February 19, 2009, internet seminar.

“Infrared Thermography, Level II Training,” training class for level II certification, May 13 - 16, 2008, Las Vegas, Nevada – passed written examination and lab assignments.

“Interpretation of Biomonitoring Data Using Physiologically Based PBPK Modeling,” October 14, 2007, Durham, North Carolina, International Society of Exposure Assessment.

“ 17<sup>th</sup> Annual Conference of the International Society of Exposure Assessment,” October 15 - 18, 2007, Durham, North Carolina.

“Mold Assessment, Remediation, and Prevention: Applying Current Best Practices,” AIHA Teleweb Virtual Seminar, September 19, 2007, internet seminar, with exam.

“Inframation 2006 – Infrared Camera Applications Conference,” conference on infrared cameras, theory and applications,” including 3 one-half day clinics on: building science applications; home inspection; and infrared camera techniques; October 23-27, 2006, Las Vegas, Nevada.

“From Exposure to Human Disease: Research Strategies to Address Current Challenges,” a two day symposium on chemical exposure evaluation and it’s role in the etiology of disease development in humans, sponsored by the Roundtable on Environmental Health Sciences, Research and Medicine, Institute of Medicine of the National Academies, September 14, 14, 2006, Washington, D.C.

“Characterization and Evaluation of Vapor Intrusion,” workshop in volatile chemical intrusion into buildings, sponsored by the Air and Waste Management Association, September 12, 2006, Los Angeles, California.

“Rule 1401 Health Risk Assessment,” training class in SCAQMD risk analysis for air emissions of new sources and existing source modifications – risk calculator methodology, October 12, 2005, Anaheim, California.

“Infrared Thermography, Level I Training,” training class for level I certification, March 8 - 11,



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2005, Albuquerque, New Mexico – passed written examinations and lab assignments.

“Mold-Related Health Effects: Clinical, Remediation Worker Protection, and Biomedical Research Issues,” seminar sponsored by Society for Occupational and Environmental Health, National Institute of Environmental Health Sciences, Association of Occupational and Environmental Clinics, NIH Office of Rare Diseases, Johns Hopkins University Bloomberg School of Public Health, Urban Public Health Program of Hunter College (SUNY), and University of Medicine and Dentistry of New Jersey School of Public Health, June 28, 29, 2004, Washington, D.C.

“Air Toxics Health Risk Assessment and HARP (California EPA’s *Hotspots Analysis and Reporting Program*)”, computer modeling workshop, June 15, 16, 2004, Anaheim, California.

“Mold, Allergens, Sampling, and Data Interpretation,” seminar sponsored by Environmental Microbiology Laboratory, May 5, 2004, Los Angeles, California.

“5<sup>th</sup> International Conference on Bioaerosols, Fungi, Bacteria, Mycotoxins and Human Health,” conference, September 10-12, 2003, Saratoga Springs, New York.

“Healthy Indoor Environments 2003, Setting the Standards for Indoor Air Quality,” conference, April 10-12, 2003, Anaheim, California.

“Comparative Sampling Techniques for Mold Investigations” and “Methods to Assess the Effectiveness of Mold Remediation” Workshops, April 9, 2003, The University of Tulsa Indoor Air Program, Anaheim, California.

“Maintaining a Healthy School Environment Workshop,” U.S. EPA Region IX update, April 8, 2003, Anaheim, California.

“Introduction to Immunology,” an update of modern immunology and changes in the past five years, sponsored by the American Association of Immunologists, June 22-25, 2002, Tufts University, Medford, Massachusetts.

“Mold Litigation Conference,” including expert discussions on morphology, fungal presence, characterization, and effects, sponsored by Mealey Publications, February 25, 26, 2002, Phoenix, Arizona.

“Asthma and Allergen Control,” an indoor air quality workshop sponsored by U.S. EPA, Region IX and the California Department of Health Services, and delivered by University of Tulsa, Oakland, California, January 22-23, 2001.

“Sampling/Biological Contamination Control,” an indoor air quality workshop organized by U.S. EPA, Region IX, and delivered by University of Tulsa, San Diego, California, September 12, 2000.

“Biological Remediation and Control,” an indoor air quality workshop organized by U.S. EPA, Region IX, and delivered by University of Tulsa, San Diego, California, September 13, 2000.

“Hands-on Training with the Decision Tools Suite: @RISK, PrecisionTree®, TopRank®, BestFit®,”

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RISKview™, RISKOptimizer™,” Ithaca, New York, June 12-14, 2000.

“Groundwater Services, Inc., User Training in Risk-Based Corrective Action (RBCA) Assessment Toolkit for Chemical Releases,” Houston, Texas, June 23, 1999.

“ASTM User Training in Risk-Based Corrective Action (RBCA) Assessment Toolkit Applied at Petroleum Release Sites,” Los Angeles, California, June 25, 1998.

“Respiratory Protection Training in Cal/OSHA Requirements for CCR Title 8, Section 5144,” by the American Safety Institute, Los Angeles, California, May 27, 1999.

“Hazardous Materials 8-Hour First Responder Operations Training — Update,” La Habra, California, September 3, 1997.

“Repair and Maintenance Operations of All Asbestos Containing Material (ACM) Types — 16 Hour O&M Training,” for certification, La Habra, California, August 3,4, 1997.

“ISO 14000 EMS Lead Auditor Course,” for certification, Fullerton, California, May 28 - June 1, 1997.

“ASTM User Training in Risk-Based Corrective Action (RBCA) Applied at Petroleum Release Sites,” San Diego, California, January 14-15, 1997.

“Air Permits Modeling Course,” Bowman Environmental, November 5-6, 1996, Los Angeles, California.

"A Guide to Voluntary Compliance in Safety and Health," U.S. Department of Labor, OSHA Training Institute, Des Plaines, Illinois, August 31 - September 4, 1992.

Lockheed Executive Institute, Lockheed Corporation, August 14-19, 1988, Calabasas, California.

"Basic Health and Safety Training Course", CDM 150.4, Camp, Dresser, and Mckee, June 22-26,1987, Springfield VA.

"Basic Leadership Laboratory," UCLA Extension Program, Ojai, California - December 4-10, 1983.

"Managerial Policy Institute," General Management Program, University of Southern California, February-May, 1983.

"Public Utilities Executives' Course," University of Idaho, July 5-29, 1982.

"Electric Utility Systems and Practices Course," GE and SCE, Oct. 1980-Feb. 1981.

"Communications Workshop," SCE sponsored (Les Crane), August 6-8, 1980.

"Supervisory Effectiveness Seminar," SCE, May 1, 1978.

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"Introduction to Supervision," U.S. Civil Service Commission, Feb. 9-13, 1976.

"Grant and Interagency Agreement Project Officer's Course," U.S. Environmental Protection Agency, June 12, 13, 1975.

" Radioisotopes in Life Science," North Carolina State University, Dec. 17-21, 1973.

#### **MEMBERSHIPS AND AFFILIATIONS**

Air and Waste Management Association  
American Association for the Advancement of Science  
American Chemical Society  
American College of Forensic Examiners  
American College of Toxicology  
American Industrial Hygiene Association  
American Society of Safety Engineers  
Phi Kappa Phi  
Sigma Xi  
Society for Risk Analysis

#### **ADDITIONAL PROFESSIONAL ACTIVITIES**

Certified Infrared Thermographer, Level II (No. 13780), Infrared Training Center, May 2008 – 5/16/2013

Certified Air Quality Specialist (CAQS 6699), Environmental Assessment Association, Present - January, 2007

Certified Environmental Consultant (CEC 6669), Environmental Assessment Association, Present - October 2005

Certified Infrared Thermographer, Level I (No. 24070), Infrared Training Center, July 2005 – 3/11/2010

Certified Mold Inspector, (CMI, 6669), Environmental Assessment Association, Present - October 2001

Certified Environmental Manager (CEM 6669), Environmental Assessment Association, Present - February 2001

Advisor, Environmental, Health and Safety Advisory Council, Office of the Director, Los Angeles Unified School District, April, 2000 - November, 1999

Fellow, American College of Forensic Examiners Institute (FACFE, No. 1196) Present - September, 1997

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Qualified Environmental Professional, Institute of Professional Environmental Practice, Present - 1996; **Re-certified May 21, 2016.**

Diplomate, American Board of Forensic Examiners (DABFE, No. 3135), Present - 1996

Fellow, American Institute of Chemists, Present - 1992

Certified Trainer for OSHA Compliance in Safety and Health (1992-1995)

Registered Environmental Assessor, State of California (REA - 00046), July 1, 2012 (end of program) - 1988.

Certified Environmental Inspector (CEI 6669), Environmental Assessment Association, Present - 1991.

Chairman, Systems and Risk Technical Advisory Committee, UCLA Engineering Research Center for Hazardous Substances Control, 1989 -1988.

Member, Policy Advisory Group, UCLA Engineering Research Center for Hazardous Substances Control, 1989 - 1988.

Graduate Student Faculty Advisor, UCLA Environmental Sciences and Engineering Program, 1987 - 1982.

Vice Chairman, Division Advisory Committee, Energy Analysis and Environment Division, Electric Power Research Institute, 1986 - 1985.

Co-Chairman, Health and Welfare Effects Committee, Utility Air Regulatory Group, 1986 - 1977.

Member, Medical Research Group, Air Pollution Research Advisory Committee, Coordinating Research Council, 1984 - 1978.

Member, Task Force on Environment, Environmental Assessment Department Advisory Committee, Electric Power Research Institute, 1984 - 1981.

Technical Manager, Edison Electric Institute/Utility Solid Waste Activity Group PCB Project, 1983 - 1981.

## **PUBLICATIONS**

Dahlgren, J., Roback, R., Dominguez, M., Byers, V., Silver, D., and E. Faeder (2013). "Case Report: Autoimmune Disease Triggered by Exposure to Hair Straightening Treatment Containing Formaldehyde." Open Journal of Rheumatology and Autoimmune Disease 3, pp. 1-6.

Eschenroeder, A. Q. and Faeder, E. J. (1988). "A Monte Carlo Analysis of Health Risks from PCB-Containing Mineral Transformer Fires." Risk Analysis 8, p.p. 291-297.

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Eschenroeder, A. Q., Doyle, C. P., and Faeder, E. J. (1986). "Health Risks of PCB Spills From Electrical Equipment." *Risk Analysis* 6, 213.

Sahl, J. D., Crocker, T. T., Gordon R. J., and Faeder, E. J. (1985). "Polychlorinated Biphenyls in the Blood of Personnel From an Electric Utility," *Journal of Occupational Medicine*, 27, pp. 639-643.

Sahl, J. D., Crocker, T. T., Gordon, R. J., and Faeder, E. J. (1985). "Polychlorinated Biphenyl Levels in the Blood Plasma of a Selected Sample of Non-Occupationally Exposed Southern California Working Adults," *Science of the Total Environment*, 46, pp. 9-18.

Grove, R. S., Bean, R. M., and Faeder, E. J. (1985). "Characteristics of Halogenated Components Discharged From Coastal Power Plant and Assessment of Their Potential Health Effects," in *Proceedings of the 5th Conference on Water Chlorination: Environmental Impact and Health Effects*, Williamsburg, Virginia, pp. 1371-1379.

Saperstein, M. D., and Faeder, E. J. (1984). "Statistical Survey of PCB Contamination in Substation and Distribution System Equipment Containing Mineral Oil," *Proceedings of the Electric Power Research Institute's Symposium on PCBs*, Atlanta, Georgia.

Bailey, D. A., Lobnitz, M. M., Doyle, C. P., and Faeder, E. J. (1984). "High-Temperature Fluid-Wall Reactor: Permitting Considerations for Commercialization" in *Proceedings of the Second Annual Conference on Municipal, Hazardous and Coal Wastes Management* (U.S. Department of Energy), Miami, Florida.

Saperstein, M. D. and Faeder, E. J. (1982). "Environmental Toxicology of PCB Substitutes for Capacitors," *Regulatory Toxicol. Pharmacol.* 2, 238.

Saperstein, M. D., Gordon, R. J., and Faeder, E. J. (1982). "PCB Contamination in Distribution Transformers," *Journal of Environmental Science and Health*, A17 (2), 241.

Doyle, C. P., Woodruff, C., Eschenroeder, A., and Faeder, E. J. (1982). "Impacts of Motor Vehicle Inspection and Maintenance on Emission Reduction in Southern California," *Science of the Total Environment* 22, 31.

Gordon, R. V., Szita, J. and Faeder, E. J. (1982). "PCB Analysis in Transformer Oil by Capillary Column Gas Chromatography," *Analytical Chemistry*, 54, 478.

Mustafa, M. G., Elsayed, N. M., and Faeder, E. J. (1980). "Biochemical Effects of Oxidant on Animal Lungs," *Toxicol. Lett.* S9, No. 1, 98.

Phalen, R. F., Reischl, P., Faeder, E. J., and Cavender, F. L. (1980). "Response of the Respiratory Tract to Inhaled Pollutants" in *Generation of Aerosols and Facilities for Exposure Experiments*, K. Willeke (ed.), Ann Arbor Science publisher, Ann Arbor, Michigan, pp. 125-140.

Mustafa, M. G., Faeder, E. J., and Lee, S. D. (1979). "Biochemical Basis of Pulmonary Response to Ozone and Nitrogen Dioxide Injury," in *Molecular Basis of Environmental Toxicology*, R. S. Bhatnager (ed.), Ann Arbor Science publisher, Ann Arbor, Michigan, pp. 151-172.



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- Chadwick, R. W., Faeder, E. J., King, L. C., Copeland, M. F., Williams, K., and Chuang, L. (1978). "Effect of Acute and Chronic Cd-Exposure on Lindane Metabolism." *Ecotoxicology and Environmental Safety* 2, 301.
- Faeder, E. J., Chaney, S. W., King, L. C., Hinners, T. A., Bruce, R., and Fowler, B. A. (1977). "Biochemical and Ultrastructural Changes in Livers of Cd-Treated Rats," *Toxicol. Appl. Pharmacol.* 39 473.
- King, L. C., Clark, V., and Faeder, E. J. (1976). "Effects of Cadmium Exposure on Rat Kidneys," *Bull. Environ. Contamin. Toxicol.* 16 572.
- Faeder, E. J., Davis, P., and Siegel, L. M. (1974). "The Role of Flavins in Catalysis by *E. coli* Sulfite Reductase," *J. Biol. Chem.* 249, 1599.
- Lucier, G. W., McDaniel, O. S., Fowler, B. W., Sanawane, B. R., Hook, G., and Faeder, E. J., (1973). "Studies on TCDD-Induced Change in Rat Liver Microsomal and Mitochondrial Enzymes," *Env. Health Perspectives*, Issue No. 5, 199.
- Faeder, E. J. and Siegel, L.M., (1973). "A Rapid Micromethod for Determination of FMN and FAD in Mixtures," *Anal. Biochem.* 63 322.
- Lucier, G. W., McDaniel, O.S., Bend, J. R., and Faeder, E. J. (1972). "Effects of Hycanthone and Two of its Chlorinated Analogs on Hepatic Microsomes," *J. Pharmacol. and Exp. Therap.* 186 416.
- Siegel, L. M., Faeder, E. J., and Kamin, H. (1972). "Flavin Interaction in NADPH Sulfite Reductase," *Z. Naturfor.* 27 1087.
- Faeder, E. J. and Hammes, G. G. (1970). "Kinetic Studies of Tryptophan Synthetase. Interaction of L-Serine, Indole, and Tryptophan with the Native Enzyme," *Biochemistry* 10 1941.
- Faeder, E. J. and Hammes, G. G., (1970). "Kinetic Studies of Tryptophan Synthetase. Interaction of Substrates with the B Subunit," *Biochemistry* 9, 4043.
- Faeder, E. J. (1970). "A Stopped Flow-Temperature Jump Apparatus: Construction and Application to the Kinetic Studies of Tryptophan Synthetase," Ph.D. Thesis, Cornell University.

## PRESENTATIONS

- Faeder, E.J. (2013), "Evaluating Potential Risk to Human Health from Nitrosamines at a Museum in Southern California," for a private client, September 5, 2013. Los Angeles, California.
- Faeder, E.J. (2011), "Air and Public Health Research Compilation Workshop – Health Risk Assessment and Health Impacts Assessment and their Roles in Siting Public Transportation Routes," participation in a workshop for a private client, April 20, 2011, Pasadena, California.
- Faeder, E.J. (2008), "Private School Ice Rink Mold Investigation and Remediation," a formal arbitration presentation describing mold investigations and remediation, and the proper form of such activities for an ice rink, February 29, 2008, Cleveland, Ohio.

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Faeder, E.J. and C. Rubin, (2007), Mold and Indoor Air Quality, Co-opting a potential issue at a local high school,” confidential briefing for board of education on school litigation issues and mold growth, November 7, 2007, southern California.

Faeder, E.J. (2005), “How to Conduct a Bad Mold Investigation and How to Do it Right,” invited speaker, Orange County Bar Association Construction Law Section, March 17, 2005 Costa Mesa, California.

Faeder, E.J. (2004), and Dr. Mark Fulmer, “Indoor Air Quality Issues – An Introduction,” invited presentation, as part of the Visalia Unified School District Workshop on Indoor Air Quality Tools for Schools, March 16, 2004, Visalia, California.

Faeder, E.J. (2003), “Health and Safety Issues: Focus on Indoor Air Quality and Hazard Communication,” conducted for Visalia Unified School District, August 23, 2003, Visalia, California.

Faeder, E.J. (2003), Windrich, Z., and J. Samaniego “Mold in Apartments,” invited presentation to the Apartment Association of Greater Los Angeles, Los Angeles, California, January 29, 2003.

Faeder, E.J., (2003) “Indoor Air Quality Issues–An Update for Employees of Visalia Unified School District,” January 16, 2003, Visalia, California.

Faeder, E.J. (2002) “Surface Mining in Wyoming: An NO<sub>2</sub> Exposure Issue,” presentation to the National Advisory Committee on Acute Exposure Guideline Levels, Washington, D.C., December 10, 2002.

Faeder, E.J. (2002) “ Nitrogen Dioxide and Human Health – Development of a Short Term Acute Exposure Goal for the Eagle Butte Mine, Gillette, Wyoming,” invited presentation to the Wyoming Environmental Quality Council, Casper, Wyoming, October 22, 2002.

Faeder, E.J. (2002) and Z. Windrich, “Target: Mold in Apartments,” invited presentation to the Apartment Association of Greater Los Angeles, Los Angeles, California, October 15, 2002.

Faeder, E.J. (2002), “Tools for Schools in Visalia — An Update for 2002.” training conducted for Visalia Unified School District, May 23, 2002, Visalia, California.

Faeder, E.J., “Indoor Air Quality Issues for Schools – A ‘Hands On’ Approach,” in-service training for employees of Visalia Unified School District and invited neighboring local district representatives, May 22, 2002, Visalia, California.

Faeder, E.J. (2001) “Mold – A Pariah or an Exaggeration,” invited speaker, private law firm, continuing education series, November 29, 2001, Orange, California.

Faeder, E.J. (2001) “Microbiological Contamination Relating to Homes and Residences,” invited speaker, regional realty group, October 31, 2001, Diamond Bar, California.

Faeder, E.J. (2001) “Effects of Nitrogen Dioxide on Human Health – Guidance in the Establishment of a Short Term, Occasional Exposure Standard to Protect the Public from Mine Blasting Activities,” invited presentation to the Wyoming Department of Environmental Protection and Wyoming Environmental Quality Council, Casper, Wyoming, September 12, 2001.

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- Faeder, E.J. (2001) "Microbiological Contamination Relating to Construction Defect Litigation," invited presentation at private insurance carrier's annual construction defect seminar, Gilford, New Hampshire, June 25, 26, 2001.
- Faeder, E.J. (2001) "Nitrogen Dioxide and Human Health," invited presentation to consortium of mining companies, Gillette, Wyoming, June 14, 2001.
- Faeder, E.J. (2000) "Indoor Air Quality Program Update – 1/18/00: Results from Testing and Interpretation," report to the Saugus Union School District Governing Board summarizing program data and status, January 17, 2000, Santa Clarita, California.
- Faeder, E.J. (1999) "Indoor Air Quality Studies in Portable Classrooms in Southern California: Chemical and Biological Impacts," invited speaker, presented to the California Inter-Agency Committee on Indoor Air Quality, Oakland, California, December 8, 1999.
- Faeder, E.J. (1999) "Air Quality Issues in the Castaic Union School District – Results from an Indoor Air Quality Program Measuring Selected Chemical and Biological Parameters in Ten Relocatable Classrooms," presentation to Castaic Union School District Board, meeting October 21, 1999.
- Faeder, E.J. (1999) "Indoor Air Issues Relating to Construction Defect Litigation – Some Observations," invited speaker, private law firm, Orange, California, October, 1999.
- Faeder, E.J. (1999) "Saugus Union School District – Indoor Air Quality Program," invited speaker, 1999 Fall School Law and Financing Workshop, Bowie, Arneson, Wiles & Giannone, Ontario, California, October, 1999.
- Faeder, E.J. (1999) "Evaluation of Indoor Air Quality Issues in the Saugus Union School District – Preliminary Results from an Indoor Air Quality Program Addressing Health Effects Issues Raised in Relocatable Classrooms," presentation to Santa Clarita Valley physicians, July, 1999.
- Faeder, E.J. (1999) "Evaluation of Indoor Air Quality Issues in the Saugus Union School District – Outline of an Indoor Air Quality Program to Address Issues Raised in Relocatable Classrooms," presentation to Indoor Air Quality Coordinators for the District, July, 1999.
- Faeder, E.J. (1999) "Proposition 65 Hazard Warnings for Potential Exposure to Ethylene Oxide," company hazard communication supplemental training for a private client, April, 1999.
- Faeder, E.J. (1998) "Environmental Compliance with Hazardous Chemical Regulations," company regulatory program training for a private client, October - December, 1998.
- Faeder, E.J. (1998) "General Health and Safety, Emergency Action and Response, Hazard Communication, Respiratory Protection, and Chemical Hygiene Training for the Pharmaceutical Device Manufacturing Industry," Pharmacia Iovision (Pharmacia & Upjohn), March - June, 1998.
- Faeder, E.J. (1997) "Environment of Care — Update in Health Care Practitioner Safety, Occupational Health, Requirements for a Medium-size Community Hospital, invited speaker, continuing education

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program, private corporation, August 26, 1997; revised version December 10, 1997 for manager/ preceptor training of all incoming staff.

Faeder, E.J. (1997) "Respiratory Protection Program Training and Certification," development of program and training/certification of selected Engineering Department personnel in a medium-size community hospital, October, 1997.

Faeder, E.J. (1997) "Chemical Exposure and Human Health Impacts Related to Litigation," invited speaker, continuing education program, private law firm, January 27, 1997.

Faeder, E.J. (1996) "Health and Safety Basic Training for New Employees in the Healthcare and Hospital Industry," orientation training for entering employees in a large, mixed ambulatory treatment/ hospital organization, January - June.

Faeder, E.J. (1996) "Health and Safety Reorientation Training for New Employees in the Healthcare and Hospital Industry," annual recurrent update training for employees in a large, mixed ambulatory treatment/ hospital organization, January - June.

Faeder, E.J. (1995) "Risk Assessment for Litigation Support: A Panel Presentation and Discussion," moderator, speaker Southern California Chapter, Society of Risk Analysis Eighth Annual Workshop, invited participant, University of Southern California, Los Angeles, California, May 18, 1995.

Faeder, E.J. (1994) "Indoor Risk Assessment," moderator, speaker, session Chair, Southern California Chapter, Society of Risk Analysis Seventh Annual Workshop, invited participant, University of Southern California, Los Angeles, California, May 19, 1994.

Faeder, E.J. (1993) "Exposure Assessment as a Key to Litigation Support: You Can't Have an Injury Without a Cause, But You Can Believe You're Hurt By What You Don't Understand," New Trends in Environmental Injury - A Seminar for Attorneys and Claims Professionals, Universal City, California, Invited Speaker, May 14, 1993.

Faeder, E.J. (1993) "Explaining Health, Safety, and Environmental Issues to Customers," American Water Works Association, California-Nevada Spring Meeting, Burbank, California, April 15, 1993.

Faeder, E.J. (1993) "Health Protection: Lessons for the Electric Utility Industry," Electric Power Research Institute Task Force Meeting, Health Studies Program Committee, San Francisco, California.

Faeder, E.J. (1991) "Environmental, Health and Safety at the Los Angeles Department of Water and Power: How are Water and Power Doing?", talk for senior management December 13, 1991.

Faeder, E.J. (1991) "Environmental, Health and Safety Regulatory Issues Affecting the Toxicologist," California Association of Toxicologists' Workshop on Environmental Toxicology, November 1, 1991, San Diego, California.

Faeder, E.J. (1991) "Health and Risk Assessment," session chairman, 1st International Society for the Advancement of Material and Process Engineering Environmental Conference, May 21-23, San Diego, California.

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- Rock, A., Kelsh, M., and E. Faeder (1991) "Information Management Approach for Databases Required for Hazard Assessment in the Aerospace Industry," 1st International Society for the Advancement of Material and Process Engineering Environmental Conference, May 21-23, San Diego, California.
- Faeder, E.J. (1990) "Environmental, Health and Safety Issues in the Aerospace Industry - or - They Don't Make Airplanes Like (Out of What) They Used To!" invited speaker, Society of Plastics Engineers Advancements in Materials for Polymer Composites and Special Topics Conference, October 16-18, Los Angeles, California.
- Faeder, E.J. (1990) "Environmental Health and Safety Issues in the Aerospace Industry," invited speaker and panel discussant, National Security Industrial Association, Manufacturing Management Committee, October 17-19, 1990, San Diego, California.
- Faeder, E. J. (1990) "Contractor Liability for Safety and Health of Subcontractor, Suppliers, and Customer Employees: Some Concerns," invited speaker, "Developing Contractor-Subcontractor Relationships for Strategic Business Opportunities," sponsored by the Orange County chapters of the National Contract Management Association and the American Bar Association (Public Contract Law Section), May 15, Buena Park, California.
- Faeder, E. J., Gurba, P. E., and Rock, A. R. (1990) "Health Effects in the Aerospace Workplace - Some Concerns," Composites in Manufacturing 9 Symposium, Society of Manufacturing Engineers, January 15-18, 1990, San Diego, California.
- Faeder, E. J. (1989). "Recent OSHA Experiences at Lockheed," Aerospace Industries Association Occupational Safety and Health/Environmental Affairs Fall Meeting, August 28-30, 1989, Boston, Massachusetts.
- Faeder, E. J. (1988). "Risk Assessment," California Aerospace Environmental Association Mid-Winter Conference, February 17, 1988, Long Beach, California.
- Faeder, E. J. (1987). "Evaluating Risk - Regulatory Trends and Impacts: Air Toxics in the West," organizing chairman, session at the Third Annual Hazardous Materials Management Conference/West, December 1-3, 1987, Long Beach, California.
- Sahl, J. D., Crocker, T. T., Saperstein M. D., and Faeder, E. J. (1985). "Occupational Exposures of Electric Utility Personnel to PCBs - A Case Study," Electric Power Research Institute PCB Seminar, October 22-25, Seattle, Washington.
- Eschenroeder, A. Q. and Faeder, E. J. (1985). "Human Health Risks from PCB-Contaminated Mineral Oil Transformers," Electric Power Research Institute PCB Seminar, October 22-25, Seattle, Washington.
- Saperstein, M. D. and Faeder, E. J. (1983). "Statistical Survey of PCB Contamination in Substation and Distribution System Equipment Containing Mineral Oil," Electric Power Research Institute's Symposium on PCBs, December 6-8, Atlanta, Georgia.

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Bailey, D. A., Lobnitz, M. M., Doyle, C. P., and Faeder, E. J. (1983). "High-Temperature Fluid-Wall Reactor: Permitting Considerations for Commercialization," Second Annual Conference on Municipal, Hazardous and Coal Wastes Management (U.S. Department of Energy), December 5-7, Miami, Florida.

Colucci, A. V. and Faeder, E. J., Brubaker, P. E., and Strieter, R. P. (1982). "A Unified Format for the Use of Human Clinical Data: Case Study NO<sub>2</sub> and SO<sub>2</sub>," Air Pollution Control Association Annual Meeting, June 20-25, New Orleans, Louisiana.

Colucci, A. V. and Faeder, E. J. (1981). "A Unified Approach to the Use of Human Clinical Data: Application to the Establishment of Air Quality Criteria," Pacific Section, American Association for the Advancement of Science, June 15, 16, Eugene, Oregon.

Mustafa, M. G., Elsayed, N. M., and Faeder, E. J. (1980). "Biochemical Effects of Oxidants in Animal Lungs," International Congress on Toxicology, July 6-11, Brussels, Belgium.

Faeder, E. J., Straughan, I. R., and Ellis, E. C. (1979). "Air Pollution Health Hazards in Southern California: Assessing the Role for the Southern California Edison Company," International Conference on Energy Use Management, October 22-26, Los Angeles, California.

Phalen, R. F., Reischl, P., Faeder, E. J., and Cavender, F. L. (1979). "Response of the Respiratory Tract to Inhaled Pollutants," American Chemical Society/Japan Chemical Society Joint Congress, April 1-6, Honolulu, Hawaii.

Faeder, E. J. and Colucci, A. V. (1978). "The Effects of Sulfate Aerosols on Human Health," American Society of Civil Engineers Convention, October 16-20, Chicago, Illinois.

Chadwick, R. C., Faeder, E. J., King, L. C., Copeland, M. F., Williams, K., and Chuang, L. (1978). "Effects of Acute and Chronic Cd Exposure on Lindane Metabolism," Society of Toxicology, Seventeenth Annual Meeting, San Francisco, California.

King, L. C., Williams, K., Faeder, E. J., and Chadwick, R. C. (1978). "Effects of Subacute Dosing on Rats Given a Delayed Exposure to Lindane," Society of Toxicology Seventeenth Annual Meeting, San Francisco, California.

Hinners, T., Faeder, E. J., and King, L. C. (1975). "Atomic Absorption Analysis of Unashed Tissue," Fall Meeting, Analytical Chemistry Division of the American Chemical Society, Chicago, Illinois.

Faeder, E. J., Chaney, S. Q., King, L. C., and Hinners, T. (1975). "Cadmium Toxicity in Rats: Differential Effects of Chronic and Acute Exposure on Liver and Kidney," American Society for Pharmacology and Experimental Therapeutics, Fall Meeting, Davis, California.

Chaney, S. Q., Faeder, E. J., King, L. C., and Hinners, T. (1975). "Protective Role of Liver Metallothionein Against Inhibition of Microsomal Proteins in the Rat," Society of Toxicology, Fourteenth Annual Meeting, Williamsburg, Virginia.

Faeder, E. J., King, L. C., Chaney, S. Q., Bruce, R., Hinners, T., and Fowler, B. (1975). "Cadmium Chloride Administration in Rats and the Onset of Liver Pathology," Society of Toxicology, Fourteenth



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Annual Meeting, Williamsburg, Virginia.

#### **TECHNICAL REPORTS**

Faeder, E.J., "Mitigation of Environmental Contamination Factors at a Large Private Residence," recommendations for private client in purchase of large estate in west Los Angeles, May 5, 2018.

Faeder, E.J., "Support for a Certificate of Merit in A Proposition 65 60-Day Notice Filing," report for a private client, December 12, 2016.

Faeder, E.J., "Assessment of Phthalates and Lead in an Assortment of Commercially Available Furniture, Clothing, and Plumbing Products for Realistic Human Exposure Potential Under Guidelines from Proposition 65," series of four reports for private clients, May 2016 through December 2016.

Faeder, E.J., "Assessment of Moisture Intrusion and Indicators of Fungal Exposure in a Private Residence," report for a private client, March 8, 2016

Faeder, E.J., "Proposition 65 Determination for Lead in Clothing Apparel and User Contact," report for a private client, March 8, 2016.

Faeder, E.J., "Proposition 65 Determination for DEHP in Clothing Apparel and User Contact," report for a private client, February 26, 2016.

Faeder, E.J., "Support for a Certificate of Merit in A Proposition 65 60-Day Notice Filing," report for a private client, December 22, 2015.

Faeder, E.J., "Proposition 65 Determination for DEHP in plastic covering of personal care product and user contact," report for a private client, November 16, 2015.

Faeder, E.J., "Alleged Exposure to Mold in a Commercial Workplace Environment and Illness in an Employee: No Association," an evaluation of reported illnesses in a hotel employee and lack of association with the work environment for a private client - used in a worker's compensation litigation matter; report prepared November 2, 2015.

Faeder, E.J., "Evaluation of Electronics Product for Phthalates and Lead Compliance with Proposition 65 Warning Requirements - an Example of No Warning Requirements for a Commercial Product," report prepared for a private client, April 12, 2015.

Faeder, E.J., Report on potential for significant fungal and bacterial exposure in a single family residence from two singular leak and flooding events," report for a private client July 18, 2014.

Faeder, , E.J., "Significance of positive urinary tract trichothecenes within the context of alleged inhalation exposure of fungal spores and hyphal fragments," report for a private client, November 25, 2013

Faeder, E.J., Bruya, J., and Clarke, T.H., "Limited Sampling Indicates the Reasonable Possibility of Ubiquitous Exposure to the Phthalate DEHP in the U.S. Population, Compliance Online, published

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May 29, 2013.

Faeder, E.J., “Habitability of a Private Residence, With Respect To Cleanup and Remediation After a Chemical Release Incident December 17, 2010,” report for a private client, October 1, 2012.

Faeder, E.J., Alleged Mold Exposure at a Hospital in Northern California – Considerations of Expert Evaluations and Workers’ Compensation Claims, With a Focus on Mycotoxin Exposure,” four reports for a private client, June 25, 2012, July 6, 2012, July 23, 2012, and October 14, 2013 involved in workers’ compensation litigation.

Clarke, T.H., , Faeder, E.J., Bruya, J., “Proposing a Plan for Prop. 65,” Law 360, New York, published on line September 9, 2011.

Faeder, E.J., “Freon Exposure in a Confined Space, on Board a Marine Fishing Vessel,” performed for a private client, involved in litigation September 27, 2011.

Faeder, E.J., “Workers’ Compensation Work Place Evaluation for Possible Relationship Between Short Term Job Performance and Tonsillar Cancer,” two reports for company involved in litigation, May 24, 2011, and September 9, 2011.

Faeder, E.J., “Evaluation and Expert Opinions Regarding the Site Contamination of Property in South Gate, California by Manufacturing Activities Allegedly Releasing Polychlorinated Biphenyls – Reconciliation of Historic and Current Measurement Data with an Historic Fire and Release from 1965,” report for a defendant, April 5, 2011.

Faeder, E.J., “Evaluation and Expert Opinions Relative to a Private Home Involved in Litigation Alleging Water Infiltration, Mold Infestation and Possible Exposure of the Residents,” report for the defendants, September 6, 2010, Las Vegas, Nevada.

Faeder, E.J., “Evaluation of Lead Coming From an Iced Tea Jar,” report for a private client relating to the need for limiting exposure to products stored in a consumer-purchased tea jar, April 27, 2010.

Faeder, E.J., “Evaluation and Expert Opinions Relative to a Private Home Involved in Litigation Alleging Mold Infestation and Health Impacts on the Residents,” report for two defendants, March 26, 2010, Las Vegas, Nevada.

Faeder, E.J., “Development of Supporting Air Quality Information for Decision Regarding Closure of Glendale Unified School District Schools Because of Wild Fires Burning in the Angeles National Forest During Late August 2009,” report for District Superintendent Dr. Michael Escalante, September 3, 2009; closure report November 2, 2009.

Faeder, E.J., “Evaluation and Expert Opinions Relative to a Private Home Involved in Litigation Alleging Mold Infestation and Health Impacts on the Residents,” report for the defendants, May 13, 2009, Las Vegas, Nevada.

Faeder, E.J., “Evaluation and Expert Opinions Relative to a Private residence – The Occurrence of Indoor Fungi, the Relative Presence of Outside Fungi, and the Potential for Health Impacts on the

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Occupants from May 2000 (Move In) Until Their Departure May 31, 2003,” technical evaluation in support of litigation, for the defendant in litigation, April 9, 2009, Paducah, Kentucky.

Faeder, E.J., “Silica Dust Sampling at the Perimeter of Remediation for a Building in a High School Complex – No Need for Health Warning under California Proposition 65,” technical evaluation of probable crystalline silica exposure and the issue of required warnings for listed compounds, on behalf of a southern California school district, August 2008.

Faeder, E.J., “Shopping Mall Reconstruction: Evaluation of Two Fungal Presence Issues and Proposed Resolution During Building Remodeling,” technical evaluation of mold presence for the owner, in Seattle, Washington, July 14, 2008.

Faeder, E.J., “Evaluation of Odor Complaints Relating to Indoor Air Quality and Hydrogen Sulfide at a Restaurant in California,” confidential letter report to an attorney representing the restaurant, based upon inspection and measurements at the restaurant, December 1, 2008.

Faeder, E.J., “Private Academy Ice Skating Rink and Mold,” technical evaluation and report of mold growth resulting from humidified air in the support areas of an indoor ice skating rink, prepared for arbitration at the request of counsel, November 2, 2007.

Faeder, E.J., “Hydrogen Sulfide Measurements in an Environmental Laboratory at a Sewage Treatment Facility,” technical report evaluating historic toxic gas exposure and risk indoors, prepared at the request of counsel, July 31, 2007.

Faeder, E.J., “Evaluation of Fungal Presence, Cleanup, and Potential Occupant Exposure to Fungi in a Private Home in Las Vegas, Nevada,” expert report prepared in for litigation matter, April 4, 2007.

Faeder, E.J., “Evaluation of Fungal Presence in a Private Home in the Tucson, Arizona Area,” report prepared for a private client March 25, 2007.

Faeder, E.J., “Inspection of Remedial Efforts to Eliminate Water Intrusion and Mold at a private residence, Coronado, California,” report prepared for a private client February 1, 2006.

Faeder, E.J., “Inspection of a low income apartment complex in southern California for water intrusion and remediation,” report for a private client, June 3, 2005.

Faeder, E.J., “Air Quality Testing at a Private Residence – Inspection, Infra-red Camera, VOC, and Fungal Testing, Results, and Recommendations,” report for a private developer client, May 26, 2005.

Faeder, E.J. “Alleged Pesticide Exposure and In Utero Exposure Subsequent to Trench and Treat Application for Termite Control – Can Exposure Cause or Contribute to Reproductive Impacts?,” report on the facts of exposure for a private client engaged in litigation, April 10, 2005.

Faeder, E.J., and Gallagher Faeder, S.M., “Review of Facts Contributing to Chemical Explosion Caused by Improper Mixing of Potassium Thiocyanate and Potassium Iodate and Subsequent Human Exposure to Fumes,” report for private client involved in litigation, April 8, 2005.

Edward J. Faeder

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Faeder, E.J., "Water Damage at Oak Grove Elementary School – Investigation, Findings, and Recommended Actions," Report addressing potential long term water damage at school under construction, prepared for Visalia Unified School District, August 21, 2003.

Faeder, E.J., "Response to Memorandum by Suzanne Wuerthele, Ph.D., and Robert Benson, Ph.D., on My December 11, 2001 Report Addressing Short Term Acute Exposure to Nitrogen Dioxide," report prepared for industry client and submitted to the Wyoming Department of Environmental Quality as part of a permit requirement, May 29, 2002.

Faeder, E.J., "Short Term Acute Exposures to Nitrogen Dioxide," report prepared for industry client and submitted to the Wyoming Department of Environmental Quality as part of a permit requirement, December 11, 2001.

Faeder, E.J., "Report on the Evaluation of Indoor Air Quality in a Private Home in Nashville, Tennessee," letter report prepared for private clients involving litigation alleging fungal growth as causal agent for illness in occupants," August, 2000.

Faeder, E.J., "Child Care Room, Bouquet Canyon Elementary School – Report on the Chemical and Biological Testing of a Classroom with an Odor Problem," final report prepared for a school district on a classroom contaminated with a toxigenic mold, May, 2000.

Faeder, E.J., "Indoor Air Quality Chemical and Biological Measurements in Relocatable Classrooms – Evaluation of Air Quality in Relocatable Classrooms Used by the Saugus Union School District," final report prepared for the Board of Education, October, 1999.

Faeder, E.J., and B. Piazza, "Proposition 65 Assessment: Ethylene Oxide Off-Gassing from Sterilized Catheters Quarantined and Stored in a Warehouse – Employee and Community Exposures," prepared for a private client, July, 1999.

Faeder, E.J., and others, "Report of Findings – Pilot-Scale Removal of Organic and Inorganic Contaminants from Waste Water Stored with Recoverable Oil Resource," evaluation of applicability of federal TSCA PCB regulations and general NPDES Order compliance for a novel biological/chemical proprietary cleanup process used by a private client, two reports in April and May, 1999.

Faeder, E.J., "Evaluation of Ethylene Oxide Off-Gas Emissions from Sterilized Products Evaluated in an Engineering Test Laboratory" prepared for a private client, April, 1999.

Faeder, E.J., "Evaluation of Iron Sponge Contamination of Soil and pH Effects in Sensitive Habitat Area at a Southern California Beach," prepared for a private client, March, 1999.

Faeder, E.J., "Site Inspection and Evaluation of Remedial Options for Odor Contamination of a Private Residence in Southern California," prepared for a private client, December, 1998.

Faeder, E.J., "Proposition 65 Cancer Risk Analysis of Ethylene Oxide Off-Gas Emissions from Sterilized Products," prepared for a private client, December, 1998.

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Edward J. Faeder

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Faeder, E.J., "Radon and Radiation Health Risks in the Area of Highlands Ranch, Colorado," written technical opinion in litigation matter before the United States district Court for the Northern District of Texas, Dallas Division, August 15, 1997.

Faeder, E.J., "Illness and Chemical Exposure in Sugar Beet Production of Sugar in Minnesota," written technical opinion in litigation matter before the United States district Court, District of Minnesota, August 14, 1996.

Faeder, E.J., "Analysis of Alleged Chemical Exposure and Potential to Produce Neurological Impacts Relating to Utility Pole Fire Emissions," written technical report for private utility client in litigation, San Barnardino County Municipal Court, November, 1996.

Faeder, E.J., "The Re-evaluation of PCB Toxicity and Basis for Re-classification of Contaminated Waste Oil," report prepared for private utility client, September, 1996.

Faeder, E.J., "Mold Contamination of a Private Residence - An Assessment with Recommendations for Further Actions on Behalf of the Occupants," report prepared for private client March, 1996, with supplement prepared May, 1996.

Faeder, E.J., and Warner, R.M., "Compliance Review of Health and Safety Activities at a Multi-Facility Health Care Network and Hospital," final report for a private client employing over 4,500 personnel, March, 1996.

Faeder, E.J., "An Activity Profile Analysis of Materials and Inventory Management at the Los Angeles Department of Water and Power," final report, July, 1995.

Faeder, E.J., "Activity Profile Analysis: Information Extraction from a Proprietary Data Base," for a confidential client, final report June, 1995.

Faeder, E.J., "Review of Health, Safety, and Environmental Issues Relating to a Large Oil Refinery and It's Operations," confidential report for a private client, July, 1994.

Faeder, E.J., "Focused Assessment of A Corporate Facility Evaluating Health Risk from Historic Waste Deposition," final report for a client to the L.A. County Fire Department, February, 1994.

Faeder, E.J., "Safety, Health and Environmental Protection: An Opportunity for Positive Change at a Large Municipal Utility," final report for client, March, 1993.

Faeder, E.J., and Lee, T. "Polychlorinated Biphenyl Substitutes in Electric Utility Equipment," final report to Electric Power Research Institute, March, 1993 (EPRI TR-10260).

Faeder, E.J., and Lee, T. "Human Health Effects of PCBs: Critical Review and Evaluation of Toxicity Information on PCBs," final report to Electric Power Research Institute, July, 1992.

Faeder, E.J. "Safety, Health and Environmental Protection at a Large Aerospace Manufacturing Compa

Edward J. Faeder

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ny: What is the Most Efficient Structure for the Corporation?", report to senior management, November, 1991.

White, B.J., and Faeder, E.J. "Report on the Safety and Health Audit of Ames Laboratory," private study for Ames National Laboratory, October, 1991.

Faeder, E.J., and Cassady, M.E., "Safety Inspection of a Secondary Lead Recovery Facility," a pre-operational inspection of a large, state-of-the-art battery lead recovery facility for a private client, July, 1991.

Faeder, E.J., and White, B.J., "Review of Environmental, Health and Safety, and Related Health Protection Activities Within A large Electric Utility," prepared for a private, Fortune 100 corporation, July, 1991.

Faeder, E.J., and White, B.J., "Recommendations to Management Regarding Safety and Health Programs in a Multi-facility Meat Production Company," prepared for a major meat producing company in a Fortune 50 corporation, April, 1991.

White, B.J., and Faeder, E.J., "Recommendations for Management and Operation of Effective Safety and Health Programs in a Paper Mill," prepared for a large private paper manufacturing company, April, 1991.

Faeder, E.J., "Toxic Substances Research at EPRI," prepared as the basis for evaluating multi-divisional toxic substances research conducted by the Electric Power Research Institute, January, 1991.

Faeder, E.J., and Schumacher, R. P. "Initial Workplace Assessment of Facilities for Crystalline Silica," prepared for a multinational cement manufacturer, November, 1990.

Stevens, D. W., and Faeder, E. J. "Need for an Environmental Impact Report: Los Angeles County Proposed Skyline Trail Extension Project," prepared for Roquemore, Pringle & Moore, December, 1988.

Faeder, E. J. "Air Toxics as a Potential Market," prepared for a private client, April, 1988.

Faeder, E. J. "Environmental Impacts Assessment of Selected Work Practices at San Vallé Tile Kilns, Corona, California," prepared for San Vallé Tile Kilns, February, 1988.

Faeder, E. J. "Health Effects Programmatic Evaluation," prepared for the Environment Division, Electric Power Research Institute, January, 1988.

Faeder, E. J., as part of Nickel Task Force, "Summary Report on Nickel," EPA, 1974.

Winge, D., Krasno, J., Faeder, E. J., and Colucci, A., "Cadmium Accumulation in Rat Liver: Correlation Between Bound Metal and Pathology," HSL, 1973.

Faeder, E. J., as part of the Pollutant Burden Indicator Team, "Collection of Autopsy Tissue Sets: CHESS Pollutant Burden Protocol," HSL, 1973.



Edward J. Faeder

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Faeder, E. J., as part of the Pollutant Burden Indicator Team, "Soil Sampling: CHESS Pollutant Burden Protocol," DHER, 1973.

Faeder, E. J., Goldstein, G., and Colucci, A. V. (1973). "The Measurement of Carbon Monoxide Bound to Human Blood," In-House Technical Report, National Research Center, RTP, NC.

Faeder, E. J., as part of the Pollutant Burden Indicator Team, "Collection of Maternal Blood: Maternal-Fetal Tissues Sets," DHER, 1972.

Revised July 23, 2018

**Trial Testimony and Deposition Testimony Log**  
**Edward J. Faeder, Ph.D., Q.E.P.**  
**2014 - 2018**

**Cases in which I have testified at trial:**

- 1 Alan Rader et al., v. TRANE U.S., Inc., et al. Superior Court of the State of California for the County of Los Angeles, West District, Case No. SC119153 – testified for the defendants, TRANE U.S., Inc, and White-Rodgers Division of Emerson Electric Co., July 8, 2014, Santa Monica, California [Attorneys: Michael G. King, Hennelly & Grossfeld, LLP, Brad Bleichner, Esq., Selman Breitman LLP]
- 2 Watermill Flying Point Trust vs. Ronald Arrache Construction Company, Inc., et al., Superior Court of the State of California for the County of Los Angeles, Case No. BC422563 – testified for the plaintiff, September 2, 2014, Los Angeles, California [Attorneys: R. Gookin, Esq., J. Kabat, , Esq., Russ, August & Kabat, Los Angeles, CA]
- 3 Buchanan, et al. vs. Twin Rock Partners, et al., Superior Court of the State of California for the County of Riverside, Case No. RIC 1114184 – testified for the defendants, March 23, 2015, Riverside, California [Attorney: Michael Schonbuch, Esq.; Daniels, Fine, Israel, Schonbuch & Lebovits LLP, Los Angeles, CA]
- 4 Tori Tracy v. Morton's Restaurant, et al., Superior Court of the State of California for the County of Orange, Central Justice Center, Case No. 30-2013-00627495 – testified for the defendant, Morton's, July 22-23, 2015, Santa Ana, California [Attorney: Susan Anderson, Esq., Marshall & French]
- 5 Terry T. Tao, Mary R. Tao, v. Richelle Arranaga Moodie, et al., Superior Court of the State of California for the County of Orange, Central Justice Center, Case No. 30-2015-008204977-CU-MC-CJC – testified for the plaintiffs, September 26, 2017, Santa Ana, California [Attorney: Scott Sachs, Esq., Atkinson, Andelson Loya, Rudd & Romo]
- 6 Gerald Seelman, Sally Seelman, Plaintiffs, vs. Coit Services, et al, Defendants, Superior Court of the State of California, County of San Diego, Case No. 37-2015-0003660 – testified for the defendant Coit Services, Inc., November 2, 2017, Vista, California [Attorney Christopher P. Regan, Esq., Law Office of Tracey Lazarus]

**Cases in which I have been deposed as an expert**

1. Alan Rader et al., v. TRANE U.S., Inc., et al. Superior Court of the State of California for the County of Los Angeles, West District, Case No. SC119153 – deposed for the defendants, TRANE U.S., Inc, and White-Rodgers Division of Emerson Electric Co., June 12, 2014, Long Beach, California [Attorneys: Michael G. King, Hennelly & Grossfeld, LLP, Brad Bleichner,

Esq., Selman Breitman LLP]

2. Tori Tracy v. Morton's Restaurant, et al., Superior Court of the State of California for the County of Orange, Central Justice Center, Case No. 30-2013-00627495 – deposed for the defendant, Morton's, June 22, 2015, Irvine, California [Attorney: Susan Anderson, Esq., Marshall & French]
3. Lewis et al., v. Federal National Mortgage Association, et al., Superior Court of the State of California for the County of San Bernardino, Case No. CIVDS1403674 – deposed for the defendant, Federal National Mortgage Association, June 23, 2015 [Attorney: Julie Corriveau. Esq., Matthew Learned, Esq., McCarthy & Holthus, LLP]
4. Gerald Seelman, Sally Seelman, Plaintiffs, vs. Coit Services, et al, Defendants, Superior Court of the State of California, County of San Diego, Case No. 37-2015-0003660 – deposed for the defendant Coit Services, Inc., October 24, 2017 [Attorney Christopher P. Regan, Esq., Law Office of Tracey Lazarus]

November 2, 2017

# EXPERT REPORT OF TAMORAH HUNT

# FORMUZIS HUNT & LANNING INC

ECONOMIC CONSULTANTS

October 29, 2018

Daniel Balaban, Esq.  
Balaban & Spielberger  
11999 San Vicente Blvd., Suite 345  
Los Angeles, CA 90049

**Re: Ruben Juarez v. PVA, Inc.**

Dear Mr. Balaban:

This report is written to comply with Federal Rules of Civil Procedure Rule 26.

I will testify regarding the economic calculations in Exhibit "A" detailing the plaintiff's loss of earnings and benefits.

Exhibit "B" cites the sources reviewed in forming my opinions.

Exhibit "C" is my curriculum vita and qualifications.

Exhibit "D" lists other cases in which I have testified as an expert within the past four years.

The report attached as Exhibit A is subject to change given updated information or documentation.

My fee for testimony is \$475.00 per hour.

If you should have any questions, please contact our office.

Sincerely,



Tamorah Hunt  
For The Firm of  
Formuzis, Hunt & Lanning, Inc.

TH:jr  
Enclosures

**EXHIBIT "A"**



**FORMUZIS, HUNT & LANNING, INC.**  
**SUMMARY OF THE ANALYSIS**  
**ECONOMIC LOSSES SUSTAINED BY**  
**RUBEN JUAREZ**

**PRESENT VALUES**

**I. LOSS OF EARNING CAPACITY**

**A. PAST LOSS ( 03/27/2014 - 03/31/2019 )**

**1. UNIMPAIRED EARNING CAPACITY**

A. WAGES/SALARY	\$376,299
B. HEALTH BENEFITS	45,955
C. SAVINGS PLAN	24,083
D. STOCK OPTIONS	PENDING
	<hr/>
	<b>\$446,337</b>

**B. FUTURE LOSS ( 04/01/2019 - 06/30/2035 )**

**1. UNIMPAIRED EARNING CAPACITY**

A. WAGES/SALARY	\$1,172,620
B. HEALTH BENEFITS	148,424
C. SAVINGS PLAN	75,048
D. STOCK OPTIONS	PENDING
	<hr/>
	<b>\$1,396,092</b>

**C. TOTAL EARNINGS LOSS (PAST AND FUTURE)**

**\$1,842,429**

**FORMUZIS, HUNT & LANNING, INC.**  
**SUMMARY OF THE ANALYSIS**  
**ECONOMIC LOSSES SUSTAINED BY**  
**RUBEN JUAREZ**

PAGE 2

PRESENT VALUE START DATE			04/01/2019
DATE OF BIRTH			01/09/1970
DATE OF INJURY			03/26/2014
AGE AT DATE OF INJURY	44.2	YEARS	
CURRENT AGE	49.2	YEARS	
EDUCATION LEVEL		BACHELORS DEGREE	
RETIREMENT DATA	62.9 <sup>1</sup>	YEARS IN	11/30/2032
	66.6 <sup>2</sup>	YEARS IN	07/31/2036
	67.0 <sup>3</sup>	YEARS IN	12/31/2036
PROJECTED RETIREMENT AGE	65.5	YEARS IN	06/30/2035
REMAINING YEARS TO RETIREMENT	16.3	YEARS	
AGE AT NORMAL LIFE EXPECTANCY (MALE)	79.7 <sup>4</sup>	YEARS IN	09/30/2049
YEARS TO NORMAL LIFE EXPECTANCY	30.5	YEARS	

FOOTNOTES.

- <sup>1</sup> HUNT, PICKERSGILL AND RUTEMILLER, "RECENT TRENDS IN MEDIAN YEARS TO RETIREMENT AND WORKLIFE EXPECTANCY FOR THE CIVILIAN U.S. POPULATION," JOURNAL OF FORENSIC ECONOMICS, VOLUME XIV, NUMBER 3, FALL 2001
- <sup>2</sup> SKOOG AND CIECKA, "PROBABILITY MASS FUNCTIONS FOR YEARS TO FINAL SEPARATION FROM THE LABOR FORCE INDUCED BY THE MARKOV MODEL," JOURNAL OF FORENSIC ECONOMICS, VOLUME XVI, NUMBER 1, WINTER 2003
- <sup>3</sup> MERCER HUMAN RESOURCE CONSULTING, INC., "2018 GUIDE TO SOCIAL SECURITY AND MEDICARE"
- <sup>4</sup> U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES, NATIONAL CENTER FOR HEALTH STATISTICS, "NATIONAL VITAL STATISTICS REPORTS," UNITED STATES LIFE TABLES, 2014

RUBEN JUAREZ  
EMPLOYMENT DATA

PAGE 3

**EMPLOYMENT PRIOR TO DATE OF INJURY:**

EMPLOYER: SPACE EXPLORATION TECHNOLOGIES  
POSITION: TECHNICIAN  
DATE OF HIRE: 01/16/2012  
DATE LAST WORKED: 03/26/2014  
BENEFITS: HEALTH INSURANCE, SAVINGS PLAN, STOCK OPTIONS,  
OVERTIME, BONUS, VACATION

**EMPLOYMENT SINCE DATE OF INJURY: NONE**

**DATE OF INJURY:** 03/26/2014

**EARNINGS HISTORY:**

YEAR	EARNINGS	SOURCE	EMPLOYER	"DD"
2012	\$68,769	W-2	SPACE EXPLORATION TECHNOLOGIES INC.	\$11,688

RUBEN JUAREZ  
UNIMPAIRED EARNING CAPACITY

PAGE 4

PENDING ADDITIONAL EARNINGS DOCUMENTATION, MR. JUAREZ' UNIMPAIRED EARNING CAPACITY BEGINNING ON MARCH 27, 2014 WAS CALCULATED BY INCREASING HIS 2012 W-2 EARNINGS WITH SPACE EXPLORATION TECHNOLOGIES, CORP. BY THE CHANGE IN THE HOURLY COMPENSATION INDEX BETWEEN 2012 AND 2018.

# 1. PAST UNIMPAIRED EARNINGS

TIME PERIOD	HOURLY COMPENSATION INDEX <sup>1</sup>	ANNUAL EARNINGS	NUMBER OF MONTHS	TOTAL EARNINGS
2012	106.849	\$68,769		
03/27/2014 - 12/31/2014	111.250	\$71,601	9.2	\$54,894
01/01/2015 - 12/31/2015	114.506	\$73,697	12.0	73,697
01/01/2016 - 12/31/2016	115.705	\$74,469	12.0	74,469
01/01/2017 - 12/31/2017	117.445	\$75,588	12.0	75,588
01/01/2018 - 03/31/2019	121.379	\$78,121	15.0	97,651
			60.2	\$376,299

# 2. PRESENT VALUE OF THE FUTURE UNIMPAIRED EARNING CAPACITY

NET DISCOUNT RATE: 1.0% <sup>2</sup>

NUMBER OF MONTHS: 195

TIME PERIOD	ANNUAL EARNINGS	MONTHLY EARNINGS
04/01/2019 - 06/30/2035	\$78,121	\$6,510
	PRESENT VALUE:	\$1,172,620

## FOOTNOTES

<sup>1</sup> U. S. DEPARTMENT OF LABOR, BUREAU OF LABOR STATISTICS, "HOURLY COMPENSATION INDEX."

<sup>2</sup> THE NET DISCOUNT RATE IS THE ANTICIPATED SPREAD BETWEEN THE RATE OF RETURN ON INVESTMENTS AND THE RATE OF INCREASE IN COMPENSATION. THE RATE OF RETURN ON INVESTMENTS IS BASED UPON A MIX OF SHORT AND MEDIUM-TERM U.S. GOVERNMENT SECURITIES. RATES OF RETURN ARE REPORTED BY THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM. COMPENSATION GROWTH IS BASED ON THE HOURLY COMPENSATION SERIES PUBLISHED BY THE U. S. DEPARTMENT OF LABOR, BUREAU OF LABOR STATISTICS.



RUBEN JUAREZ  
UNIMPAIRED HEALTH BENEFIT

PAGE 5

PENDING INFORMATION REGARDING THE EMPLOYER CONTRIBUTION TO MR. JUAREZ' HEALTH INSURANCE BENEFITS, THE VALUE OF THESE BENEFITS BEGINNING IN APRIL 2014 WAS CALCULATED USING THE AVERAGE EMPLOYER CONTRIBUTION TO HEALTH INSURANCE BENEFITS REPORTED IN THE KAISER FAMILY FOUNDATION AND HEALTH RESEARCH & EDUCATIONAL TRUST, EMPLOYER HEALTH BENEFITS.

# 1. PAST HEALTH BENEFIT

TIME PERIOD	ANNUAL <sup>1</sup> BENEFIT	MONTHLY BENEFIT	NUMBER OF MONTHS	TOTAL BENEFIT
03/27/2014 - 03/31/2014		\$0	0.2	\$0
04/01/2014 - 12/31/2014	\$8,478	\$706	9.0	6,358
01/01/2015 - 12/31/2015	\$8,885	\$740	12.0	8,885
01/01/2016 - 12/31/2016	\$9,086	\$757	12.0	9,086
01/01/2017 - 12/31/2017	\$9,263	\$772	12.0	9,263
01/01/2018 - 03/31/2019	\$9,890	\$824	15.0	12,363
			60.2	\$45,955

# 2. PRESENT VALUE OF THE FUTURE HEALTH BENEFIT

NET DISCOUNT RATE: 1.0% <sup>2</sup>

NUMBER OF MONTHS: 195

TIME PERIOD	ANNUAL BENEFIT	MONTHLY BENEFIT
04/01/2019 - 06/30/2035	\$9,890	\$824
	PRESENT VALUE:	
		\$148,424

## FOOTNOTES

<sup>1</sup> THE KAISER FAMILY FOUNDATION AND HEALTH RESEARCH & EDUCATIONAL TRUST: EMPLOYER BENEFITS 2018 ANNUAL SURVEY

<sup>2</sup> THE NET DISCOUNT RATE IS THE ANTICIPATED SPREAD BETWEEN THE RATE OF RETURN ON INVESTMENTS AND THE RATE OF INCREASE IN COMPENSATION. THE RATE OF RETURN ON INVESTMENTS IS BASED UPON A MIX OF SHORT AND MEDIUM-TERM U.S. GOVERNMENT SECURITIES. RATES OF RETURN ARE REPORTED BY THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM. COMPENSATION GROWTH IS BASED ON THE HOURLY COMPENSATION SERIES PUBLISHED BY THE U.S. DEPARTMENT OF LABOR, BUREAU OF LABOR STATISTICS.

RUBEN JUAREZ  
SAVINGS PLAN BENEFIT

PAGE 6

PENDING INFORMATION REGARDING THE EMPLOYER CONTRIBUTION TO MR. JUAREZ' SAVINGS PLAN AT SPACE EXPLORATION TECHNOLOGIES, THE VALUE OF THIS BENEFIT WAS CALCULATED USING AVERAGE EMPLOYER CONTRIBUTIONS TO DEFERRED COMPENSATION BENEFITS FOR ALL INDUSTRIES, EQUAL TO 4.7 PERCENT OF EARNINGS.<sup>1</sup>

FOOTNOTE

<sup>1</sup> EXPECTANCY DATA, EMPLOYER PAID BENEFITS. MARCH 2016, SHAWNEE MISSION, KANSAS, 2016.



RUBEN JUAREZ  
STOCK OPTIONS

PAGE 7

THROUGH HIS EMPLOYMENT, IT IS REPORTED THAT MR. JUAREZ RECEIVED STOCK OPTIONS. PENDING INFORMATION REGARDING THE VALUE OF THIS BENEFIT, NO LOSS CALCULATION HAS YET BEEN MADE.

**EXHIBIT “B”**

**EXHIBIT "B"**

**SOURCES AND SUPPORTING DOCUMENTS**

1. FORMUZIS, HUNT & LANNING, PERSONAL INJURY CHECKLIST
2. U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES, NATIONAL CENTER FOR HEALTH STATISTICS, "NATIONAL VITAL STATISTICS REPORTS." UNITED STATES LIFE TABLES, 2014.
3. HUNT, PICKERSGILL AND RUTEMILLER, "RECENT TRENDS IN MEDIAN YEARS TO RETIREMENT AND WORKLIFE EXPECTANCY FOR THE CIVILIAN U.S. POPULATION," JOURNAL OF FORENSIC ECONOMICS, VOLUME XIV, NUMBER 3, FALL 2001.
4. SKOOG AND CIECKA, "PROBABILITY MASS FUNCTIONS FOR YEARS TO FINAL SEPARATION FROM THE LABOR FORCE INDUCED BY THE MARKOV MODEL," JOURNAL OF FORENSIC ECONOMICS, VOLUME XVI, NUMBER 1, WINTER 2003.
5. MERCER HUMAN RESOURCES CONSULTING, INC., "2018 GUIDE TO SOCIAL SECURITY AND MEDICARE"
6. HISTORICAL INTEREST RATES, BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM.
7. CURRENT INTEREST RATES ON U.S. TREASURY BONDS AND NOTES BY MATURITY PER THE *WALL STREET JOURNAL*.
8. 2012 W-2 EARNINGS
9. U. S. DEPARTMENT OF LABOR, BUREAU OF LABOR STATISTICS, "HOURLY COMPENSATION INDEX."
10. THE KAISER FAMILY FOUNDATION, EMPLOYER HEALTH BENEFITS, 2018 ANNUAL SURVEY.
11. EXPECTANCY DATA, EMPLOYER PAID BENEFITS: MARCH 2016, SHAWNEE MISSION, KANSAS, 2016.

**EXHIBIT "C"**

# **FORMUZIS HUNT & LANNING INC**

ECONOMIC CONSULTANTS

## **TAMORAH HUNT, PH.D.**

### **EMPLOYMENT**

Economist and Principal in Formuzis, Hunt and Lanning, Inc.

### **EDUCATION**

B.A., Economics: California State University, Fullerton, 1986

M.B.A., Finance: University of California, Irvine, 1991

M.A., Economics: Claremont Graduate School, 1994

Ph.D., Economics: Claremont Graduate School, 1999

### **EXPERIENCE**

Economic Consultant, Formuzis, Hunt and Lanning, Inc., January 1995

Managing Senior Research Economist, Formuzis & Pickersgill, Inc., June 1990 - December 1994

Senior Research Economist, Formuzis & Pickersgill, Inc., June 1989 - June 1990

Research Economist, Formuzis & Pickersgill, Inc., June 1985 - June 1989

### **HONORS AND AWARDS**

Highest Honors, California State University, Fullerton, 1986

Phi Kappa Phi, California State University, Fullerton, 1986

Dean's Scholar, University of California, Irvine, 1991

Beta Gamma Sigma, University of California, Irvine, 1991

Claremont Graduate School Fellowship, 1992

Bradley Fellowship, Claremont Graduate School, 1993

Bradley Fellowship, Claremont Graduate School, 1994



### **PROFESSIONAL ASSOCIATIONS**

National Association of Forensic Economists

Western Economic Association

American Economic Association

Claremont Graduate University, Board of Visitors 2009 - 2011

### **PUBLICATIONS & PRESENTATIONS**

"Median Years to Retirement and Worklife Expectancy for the Civilian U.S. Population," (Tamorah Hunt, Joyce Pickersgill & Herbert Rutemiller, co-authors), Journal of Forensic Economics, Volume X, Number 2, Spring/Summer 1997.

"Median Years to Retirement," (Tamorah Hunt, Joyce Pickersgill & Herbert Rutemiller, co-authors), in Life and Worklife Expectancies, Hugh Richards, M.S. and Jon R. Abele, Esq., Lawyers & Judges Publishing Company, Inc., 1999.

"The Variation in Present Value of Forecast Earnings Resulting from the Use of Age-Earnings Profiles," Western Economic Association, 71st Annual Conference, 7/96, San Francisco, California.

"Recent Trends in Median Years to Retirement and Worklife Expectancy for the Civilian U.S. Population," (Tamorah Hunt, Joyce Pickersgill & Herbert Rutemiller, co-authors), Journal of Forensic Economics, Volume XIV, Number 3, Fall 2001.

"The Calculation and Use of Retirement Age Statistics: A Recap Since 1970," (Tamorah Hunt, Joyce Pickersgill & Herbert Rutemiller, co-authors), in Developments in Litigation Economics, Contemporary Studies in Economic and Financial Analysis, Volume 87, Patrick A. Gaughan and Robert J. Thornton, Editors, Elsevier, 2005.

"Understanding the Building Blocks of Present Value," Advocate, November 2009.



# **FORMUZIS HUNT & LANNING INC**

## **ECONOMIC CONSULTANTS**

### **TIMOTHY LANNING**

#### **EMPLOYMENT**

Economist and Principal in Formuzis, Hunt & Lanning, Inc., May 2017 - present  
Managing Associate Economist, Formuzis, Pickersgill, & Hunt, Inc., July 2003 – April 2017  
Senior Research Economist, Formuzis, Pickersgill, & Hunt, Inc., July 1996 - June 2003  
Research Economist, Formuzis, Pickersgill, & Hunt, Inc., October 1990 – June 1996

#### **EDUCATION**

B.A., Economics: California State University, Fullerton, 1990  
M.A., Economics: Claremont Graduate University, 2002  
ABD Economics: Claremont Graduate University

#### **HONORS AND AWARDS**

Highest Honors, California State University, Fullerton, 1990  
Claremont Graduate School Fellowship, 1998  
George and Patricia Brinton Fellowship, 1999  
The John Randolph Haynes and Dora Haynes Foundation Fellowship, 2001

#### **PROFESSIONAL ASSOCIATIONS**

National Association of Forensic Economists  
Western Economic Association

#### **PUBLICATIONS**

"Issues in Employment Litigation Analysis," (Thomas Roney and Timothy Lanning, Co-Authors), Chapter 11 in Forensic Economics: Assessing Personal Damages in Civil Litigation, Frank Tinari, Editor, Palgrave MacMillin, 2016.

**EXHIBIT "D"**

**TAMORAH HUNT  
2018**

DATE	EVENT	CASE	CASE #	ATTORNEY	LOCATION	DEPT
01/02/18	DEPOSITION	PINTER-BROWN, LAUREN (M.D.) V. REGENTS OF UNIVERSITY OF CA	BC624838	SHEGERIAN, CARNEY R.	LOS ANGELES	
01/11/18	DEPOSITION	GARCIA, RUTH V DYNALECTRIC COMPANY, EMCOR GROUP ET AL		SHEGERIAN, CARNEY R.	LOS ANGELES	
01/25/18	TESTIMONY	CHAVARRIA V. MANAGEMENT AND TRAINING CORP.		STILLWELL, GENIENE B.	SAN DIEGO	15A
02/05/18	TESTIMONY	PINTER-BROWN, LAUREN (M.D.) V. REGENTS OF UNIVERSITY OF CA	BC624838	SHEGERIAN, CARNEY R.	LOS ANGELES	34
02/06/18	TESTIMONY	LENNIG, MATTHEW V. CRST TRUCKING	MC025288	SCHECHTER, BRUCE LEE	LOS ANGELES	3
02/06/18	TESTIMONY	LENNIG, MICHAEL V. CRST TRUCKING	MC025288	PANISH, BRIAN	LOS ANGELES	3
02/08/18	DEPOSITION	GENOVIA, MARY V. KOUYOUMDJIAN BEKEREDJIAN, AIVAZIAN DENTAL	BC 648880	SHEGERIAN, CARNEY R.	FHL	
02/09/18	DEPOSITION	RUDNICKI, ANDREW V. FARMERS INSURANCE GROUP	BC 630158	SHEGERIAN, CARNEY R.	IRVINE	
02/15/18	DEPOSITION	TAYLOR, ANTHONY V. SAMANTHA SCHILLING	MC026518	WHEELER, ALEX	FHL	
02/20/18	TESTIMONY	MATLOW, STEPHANIE V. SETON PARKING, INC.	BC573152	MC ELROY, STEPHEN K.	SANTA MONICA	G
02/23/18	DEPOSITION	LIMA-CARNAGHI, MARIBEL V DIKRIAN UROLOGY	BC562486	RAMEY, CHRISTA	FHL	
02/26/18	DEPOSITION	GRAVES, RACHEL V. KAISER FOUNDATION		HAMMERSTRAND, JOHN	SAN DIEGO	
02/27/18	TESTIMONY	VASQUEZ (LEON) V. GEORGE T. BORIS AND HUGHES, M.D.	BC573903	GELFAND, GARY B.	SANTA MONICA	O
03/01/18	DEPOSITION	MARTINEZ, MARIA v. RITE AID, INC.		SHEGERIAN, CARNEY R.	BURBANK	
03/02/18	DEPOSITION	GARCIA, MARIA VS. LAWRENCE BARNES	BC615275	HABBAS, SAMER	IRVINE	
03/13/18	DEPOSITION	MERCADO, JULIAN V. AVO MEHRABIAN, BROADWAY TOWING, INC.	BC615314	MC ELROY, STEPHEN K.	FHL	
03/14/18	DEPOSITION	GAMA, JUAN V. GENERAL MILLS		SHEGERIAN, CARNEY R.	LOS ANGELES	
03/19/18	TESTIMONY	MARTINEZ, MARIA v. RITE AID, INC.		SHEGERIAN, CARNEY R.	LOS ANGELES	68
03/23/18	DEPOSITION	BAGHDACHI, ABBAS V. UNITED FABRICARE SUPPLY, INC. ET AL.		SHEGERIAN, CARNEY R.	LOS ANGELES	
03/29/18	DEPOSITION	AGUILAR, LUZ V. B.B. & E.J. TRUCKING, ET AL.	BC638208	LANZETTA, TOBIN	SANTA ANA	
04/10/18	TESTIMONY	TAYLOR, ANTHONY V. SAMANTHA SCHILLING		WHEELER, ALEX	LOS ANGELES	41
04/12/18	TESTIMONY	GARCIA, MARIA VS. LAWRENCE BARNES		HABBAS, SAMER	LOS ANGELES	73
04/12/18	TESTIMONY	GAMA, JUAN V. GENERAL MILLS		SHEGERIAN, CARNEY R.	LOS ANGELES	78
05/01/18	DEPOSITION	HERRON V. LOS ANGELES COUNTY SHERIFF'S DEPARTMENT		LUCIEN, DARRYL	FHL	
05/02/18	DEPOSITION	GOMEZ, ALMA V HENRY MAYO NEWHALL MEMORIAL HOSPITAL		SHEGERIAN, CARNEY R.	LOS ANGELES	
05/03/18	DEPOSITION	KAUR, GAGANDEEP, ET AL. V. DESTINATION ANYWHERE, INC., ET AL.		BOSKOVICH, MARK	OAKLAND	
05/08/18	DEPOSITION	LOPEZ V. UNITED STATES OF AMERICA, NATIONAL STEEL, ET AL		EASLEY, PRESTON	ORANGE	



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DATE	EVENT	CASE	CASE #	ATTORNEY	LOCATION	DEPT
05/17/18	DEPOSITION	LUTTRELL V. SUNIL BHOYRUL, M.D., OLDE DEL MAR SURGERY CENT	29348	MARTEL, AMY	FHL	
05/22/18	DEPOSITION	TOMAZIC, VICTORIA DEC'D V CENTRAL BEST PHARMACY	RIC1607117	LAW, PATRICIA	FHL	
05/23/18	DEPOSITION	TOEPPE V. CITY OF SAN DIEGO		BALABAN, DANIEL	FHL	
06/07/18	TESTIMONY	LIMA-CARNAGHI, MARIBEL V DIKRIAN UROLOGY	BC562486	RAMEY, CHRISTA	PASADENA	P
06/11/18	DEPOSITION	LEVITAN, LYNN V. APPLE	BC 622413	SHEGERIAN, CARNEY R.	LOS ANGELES	
06/13/18	DEPOSITION	MONTGOMERY V. PACIFIC FAMILY MEDICINE, ET AL.		MC MAHAN, CARL A.	FHL	
06/14/18	DEPOSITION	SMITH, PAUL V KAISER		ERICKSON, JEFF	FHL	
06/18/18	DEPOSITION	LYLE V. LITTLE COMPANY OF MARY		DENOVE, JOHN	FHL	
06/20/18	DEPOSITION	LASARTE, JUAN V ROTAREX NORTH AMERICA ET AL	BC514465	BALABAN, DANIEL	FHL	
06/25/18	TESTIMONY	RAEL, CODIE V AXIS SYBRONENGO		SHEGERIAN, CARNEY R.	LOS ANGELES	52
06/28/18	TESTIMONY	ANTEMATE V ESTENSON LOGISTICS		SZETO, KITTY	LOS ANGELES	7D
07/06/18	DEPOSITION	SANFORD, DAVID V. YRC, INC., YRC FREIGHT AND ALVIN CHILDS	495376	MC ELROY, STEPHEN K.	FHL	
07/18/18	DEPOSITION	LO, JASON V. DOMINICK CONSOLAZIO, SO. CALIFORNIA GAS CO	BC653464	DUNBAR, DANIEL	FHL	
07/23/18	TESTIMONY	BIDDLE, KELLY RYAN V SEAVIEW IVA & STEWART BLOOM, MD		BENNETT, VINCENT	VENTURA	41
07/24/18	TESTIMONY	LASARTE, JUAN V ROTAREX NORTH AMERICA ET AL	BC514465	BALABAN, DANIEL	LOS ANGELES	35
07/27/18	DEPOSITION	FOLEY, JAMES V. CHEVRON	BC553826	SHEGERIAN, CARNEY R.	FHL	
07/31/18	TESTIMONY	SIMONE, ELIJAH POMAIIKA V BRUCE JAMESON	832256	CULLINS, DOUGLAS	SANTA ANA	33
08/02/18	DEPOSITION	SPANOS V. KAISER		LAW, PATRICIA	FHL	
08/06/18	DEPOSITION	SHULHA V. FLORES	BC599770	GIBSON, ROBERT	SANTA ANA	
08/07/18	DEPOSITION	MORENO, MARIA V. TOYOTA MOTOR COMPANY, ET AL.	BC640274	RITSEMA, SCOTT	FHL	
08/10/18	DEPOSITION	AU, JENNIFER V AMY STERN, ET AL.	31956	MC ELFISH, RAY	COAST MESA	
08/23/18	DEPOSITION	LEE, NICHOLAS (DEC'D) V. CITY OF BEVERLY HILLS		EHRlich, JUSTIN	LOS ANGELES	
08/28/18	DEPOSITION	HURKA-RAMIREZ., TERESA V. THE BOEING COMPANY, INC.	03347-AB-RAO	STILLWELL, GENIENE B.	LOS ANGELES	
08/29/18	DEPOSITION	AGUILAR, VILMA V. BLAZE PIZZA LLC	BC651278	GORDON, MATTHEW	LOS ANGELES	
09/06/18	TESTIMONY	HERRON V. LOS ANGELES COUNTY SHERIFF'S DEPARTMENT		LUCIEN, DARRYL	LOS ANGELES	69
09/24/18	DEPOSITION	MEYER, CYNTHIA V FARMERS	BC625867	SHEGERIAN, CARNEY R.	SHERMAN OAKS	
09/25/18	DEPOSITION	CORONEL V. QUEST HOMEOWNERS ASSOC., ET AL.	40028	PUCHALT, IVAN	FHL	

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<b>DATE</b>	<b>EVENT</b>	<b>CASE</b>	<b>CASE #</b>	<b>ATTORNEY</b>	<b>LOCATION</b>	<b>DEPT</b>
09/26/18	DEPOSITION	SMITH, ANTHONY V. LA CASA MENTAL HEALTH REHAB. CENTER	BC 634014	SHEGERIAN, CARNEY R.	LOS ANGELES	

**TAMORAH HUNT**  
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DATE	EVENT	CASE	CASE #	ATTORNEY	LOCATION	DEPT
01/04/17	ARBITRATION	TORRES V. PHAM, MD		MC MAHAN, CARL A.	LOS ANGELES	250
01/10/17	TESTIMONY	BARRERA, BLAS V. MIGUEL MURILLO	BC546676	ROWELL, JOHN D.	LOS ANGELES	316
01/11/17	TESTIMONY	DE LEON V. FREGOSO, CITY OF NORWALK, ET AL.	BC528572	DI MONDA, JOSEPH	LOS ANGELES	96
01/24/17	TESTIMONY	WILLIAMS, TROY V. RALPHS		SHEGERIAN, CARNEY R.	LOS ANGELES	3
01/25/17	TESTIMONY	COYLE V. UC REGENTS AND DALLAS ROVERSTEIN (UC RIVERSIDE)		PEARLMAN, CASEY	RIVERSIDE	7
01/30/17	DEPOSITION	FIELD V. GLASS, ET AL.		CLAYTON, ROBERT	FP&H	
01/31/17	DEPOSITION	KING, BRADLEY V U.S. BANK		ROBINSON, ROBERT C.	IRVINE	
02/06/17	DEPOSITION	RUSSOTA, RONIT VS THREE HANDS CORPORATION		SHEGERIAN, CARNEY R.	LOS ANGELES	
02/07/17	DEPOSITION	SANCHEZ, CATHERINE V. NATEC INTERNATIONAL, INC.		WEIDMANN, MARK	SANTA ANA	
02/14/17	DEPOSITION	UDELL, JOHN V. PAR ELECTRICAL CONTRACTORS	BC554272	KWASNIEWSKI, GARY	FP&H	
02/22/17	TESTIMONY	BEGAZO, CYNTHIA V. PASSAGES MALIBU	BC595150	SHEGERIAN, CARNEY R.	LOS ANGELES	69
02/23/17	TESTIMONY	HERNANDEZ V. FIRST STUDENT, INC. AND SILVER VALLEY USD		CARLSON, RAY C.	SAN BERNARDINO	S22
02/23/17	DEPOSITION	BERNSTEIN, JENNIFER V ROBERT FIELDS, M.D., ET AL		BUNCH, BRUCE M.	FP&H	
02/24/17	DEPOSITION	KIAIE V. HUBBLE	283432-SPC	WHEELER, ALEX	FP&H	
02/28/17	DEPOSITION	ABOABDO, MUNA V. REGENTS OF THE UNIVERSITY OF CALIFORNIA	839546	SHEGERIAN, CARNEY R.	FP&H	
03/29/17	TESTIMONY	FIELD V. GLASS, ET AL.		CLAYTON, ROBERT	TORRANCE	11
04/04/17	TESTIMONY	NUNEZ, JOSE V. PAK	BC586700	SCHECHTER, BRUCE LEE	VAN NUYS	
04/05/17	DEPOSITION	ANYSENKO, ANTHONY, ET AL. V. U.S. NATIONAL LEASING, ET AL.		BOSKOVICH, MARK	COSTA MESA	
04/10/17	DEPOSITION	BARNES, JAY V CONTINENTAL INSURANCE COMPANY		SHEEHAN, JOHN	FP&H	
04/12/17	DEPOSITION	BRENNEN, MONSERRAT v. WALMART, ET AL.	BC586742	SHEGERIAN, CARNEY R.	LOS ANGELES	
04/18/17	DEPOSITION	SIVARAJAH, MEERA V. JACQUELINE PECK	BC546090	MC ELROY, STEPHEN	VAN NUYS	
04/26/17	TESTIMONY	PORTER, ET AL V. WYNER, ET AL.		WOODLAND, LAUREN	LOS ANGELES	96
04/28/17	TESTIMONY	SANCHEZ, CATHERINE V. NATEC INTERNATIONAL, INC.		WEIDMANN, MARK	SANTA ANA	C-32
05/02/17	TESTIMONY	KING, BRADLEY V U.S. BANK		ROBINSON, ROBERT C.	SANTA ANA	
05/10/17	TESTIMONY	LAHLJANI, FLORA V. FARDIN HAKAKIAN	BC579400	MC ELROY, STEPHEN	VAN NUYS	Q
05/11/17	TESTIMONY	VERRAZONO, GARY V. GEHL COMPANY, ET AL.	BC540325	LANZETTA, TOBIN	SANTA ROSA	
05/15/17	DEPOSITION	SPRADLIN V. SMITH	BC586442	FOWLER, JASON	FP&H	



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DATE	EVENT	CASE	CASE #	ATTORNEY	LOCATION	DEPT
05/16/17	DEPOSITION	GARCIA, CANDACE AND SAENZ V. LCK TRUCKING, INC., ET AL.	BC 582701	CLARK, MATTHEW	FP&H	
05/31/17	DEPOSITION	VICTORIA, JOHN V. STUART LEVITON AND CITY OF LOS ANGELES	BC 541698	BALABAN, DANIEL	LOS ANGELES	
06/07/17	DEPOSITION	RADICH, NICOLE		BISH, MINDY. S	FP&H	
06/08/17	DEPOSITION	SANTANA, ELENA ALFONSO V. DR. JERRY KAO, ET AL.		CHIHAK, CYNTHIA	FP&H	
06/13/17	TESTIMONY	SIVARAJAH, MEERA V. JACQUELINE PECK	BC546090	MC ELROY, STEPHEN	SANTA MONICA	I
06/22/17	DEPOSITION	GOEBEL, CARLY VS ALPERN	BC569720	WHEELER, ALEX	FP&H	
06/22/17	TESTIMONY	MOLAND V. McWANE, INC., ET AL.	BC559796	SHEGERIAN, CARNEY R.	LOS ANGELES	96
06/28/17	DEPOSITION	COBB, JAMES V COUNTY OF LOS ANGELES		DANIELS, WILLIAM A.	FP&H	
06/29/17	TESTIMONY	MOLAND V. McWANE, INC., ET AL.		SHEGERIAN, CARNEY R.	LOS ANGELES	96
06/30/17	DEPOSITION	JONES, KEVIN V. KAISER	BC 630034	WEIDMANN, MARK	LOS ANGELES	
07/07/17	DEPOSITION	ESCAMILLA V. COUNTY OF SAN BERNARDINO, ET AL.		WELLS, JEFF	SANTA MONICA	
07/10/17	DEPOSITION	WAHEED V. KAISER	ARB 12121	DRAGANOV, BRON	FP&H	
07/25/17	DEPOSITION	LENNIG, MATTHEW V. CRST TRUCKING	MC025288	SCHECHTER, BRUCE	FP&H	
07/25/17	DEPOSITION	LENNIG, MICHAEL V. CRST TRUCKING	MC025288	SCHECHTER, BRUCE	FP&H	
08/02/17	DEPOSITION	MARTINEZ, JOSE ALFREDO V. MICHAELS		SHEGERIAN, CARNEY R.	FP&H	
08/03/17	DEPOSITION	GEORGE, DENNIS V. DELTA FABRICATIONS		SHEEHAN, JOHN	FP&H	
08/03/17	DEPOSITION	MODAFF, CHARILYN V CARMAX AUTO SUPERSTORE		DEAN, WARREN	FP&H	
08/09/17	DEPOSITION	HERRERA, JORGE V. POWER DISTRIBUTION INC, ET AL.		SMITH, PERRY	LOS ANGELES	
08/14/17	DEPOSITION	PAUL V. VALDOVINOS		SAADIAN, BOBBY	FP&H	
08/16/17	TESTIMONY	COBB, JAMES V COUNTY OF LOS ANGELES		DANIELS, WILLIAM A.	LOS ANGELES	76
08/25/17	TESTIMONY	ASTORGA, CESAR V SNAP ON		GRIFFIN, KEITH	LOS ANGELES	
08/30/17	TESTIMONY	ASTORGA, CESAR V SNAP ON		GRIFFIN, KEITH	LOS ANGELES	
09/05/17	TESTIMONY	ESCAMILLA V. COUNTY OF SAN BERNARDINO, ET AL.		WELLS, JEFF	SAN BERNARDINO	S-31
09/06/17	DEPOSITION	CASTILLO, BOBBIE V. ARCH DIOCESE OF LOS ANGELES, ET AL.	BC596624	SHEGERIAN, CARNEY R.	ENCINO	
09/08/17	ARBITRATION	WAHEED V. KAISER		FAGEL, BRUCE	ORANGE	1400
09/11/17	DEPOSITION	DING, YAN & ZOHGHAN WANG V CHINA OVERSEAS TRAVEL GROUP	IBC590677	SMITH, TAYLOR	FP&H	
09/13/17	DEPOSITION	KOK V. BRINDERSON LP, ET AL	BCV-15-101112	COHN, DAVID K.	FP&H	

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09/20/17	DEPOSITION	BIDDLE, KELLY RYAN V SEAVIEW IVA & STEWART BLOOM, MD		BENNETT, VINCENT	FP&H	
09/21/17	DEPOSITION	MARMONT, LINDSEY V. BERNZOMATIC CORP, ET AL.		DORDICK, GARY	FP&H	
10/12/17	DEPOSITION	HO, CHISUNG (GUARDIAN, SEOKHO OH) V LA LAKE LLC, HPG MGMT,	BC610086	KIM, TAE-YOON	FP&H	
10/17/17	DEPOSITION	SALEHI, RAY V CITY OF WEST HOLLYWOOD	BC631147	SHEGERIAN, CARNEY R.	LOS ANGELES	
10/18/17	DEPOSITION	ROBLES V. LOPEZ	S1500CV283759	WHEELER, ALEX	LOS ANGELES	
10/24/17	TESTIMONY	MITCHELL, TALBERT V SEIU LOCAL #721	BC575572	SHEGERIAN, CARNEY R.	LOS ANGELES	52
11/01/17	TESTIMONY	RADICH, NICOLE		BISH, MINDY. S	VAN NUYS	8
11/03/17	DEPOSITION	RANGEL, IMER V. LOS ANGELES UNIFIED SCHOOL DISTRICT	BC606357	KIM, TAE	FP&H	
11/07/17	DEPOSITION	VASQUEZ, KEVIN V. JACK IN THE BOX, INC.		BISH, MINDY. S	FP&H	
11/07/17	DEPOSITION	INDUGULA V. SALESFORCE, ET AL.		ELLIS, LUKE	COSTA MESA	
11/27/17	TESTIMONY	MITCHELL, TALBERT V SEIU LOCAL #721		SHEGERIAN, CARNEY R.	LOS ANGELES	52
11/28/17	DEPOSITION	HARVEY, LARRY V GLOBAL TECHNICAL SERVICES	1-16-CV-0157	FOLINSKY, MARNI	FP&H	
11/30/17	DEPOSITION	VASQUEZ, ARLEEN DEC'D V GEORGE T. BORIS	BC573903	REZNICK, MICHAEL	LOS ANGELES	
12/04/17	DEPOSITION	MONTTOY, MARIA LUISA V. JOSE GOMEZ, ET AL.	BC603562	MC ELROY, STEPHEN	FP&H	
12/12/17	DEPOSITION	BURKITT, HOWARD V HA LE, MD ADILI-KHMAS, MD	1503563	RAYNES, JEFFREY	FP&H	
12/19/17	DEPOSITION	RUIZ, VICENTE V. BARR COMMERCIAL DOOR REPAIR, INC.		GORDON, ROGER L.	FP&H	



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01/06/16	DEPOSITION	ESTATE OF DARWIN HERZOG V AMBITIONS CALIFORNIA INC	BC555654	STUART, ANTHONY	FP&H	
01/07/16	DEPOSITION	E. D. AND ANTIONE D. V. COUNTY OF LOS ANGELES, ET AL.		MASSEY, MARK	LOS ANGELES	
01/13/16	TESTIMONY	BRIONES, FRANCISCO V. CHRISTOPHER LEE ZINK	56-2013-00435440	DORDICK, GARY A.	VENTURA	40
01/19/16	DEPOSITION	ZUEHLSDORF, STEVE VS GORDON TRUCKING INC.		SHEGERIAN, CARNEY R.	LOS ANGELES	
01/25/16	DEPOSITION	BRAVO V. UNITED STATES OF AMERICA		MC MAHAN, CARL A.	FP&H	
01/26/16	TESTIMONY	HARRY, TARA V. LOMA LINDA MEDICAL CENTER, ET AL.		LAW, PATRICIA	SAN BERNARDINO	S-22
01/27/16	TESTIMONY	GANTNER, JACQUELINE V. LEMONADE RESTAURANT GROUP, LLC		SHEGERIAN, CARNEY R.	LOS ANGELES	36
02/08/16	TESTIMONY	FULTON V. CALTRANS		ESTEY, STEPHEN J.	SAN DIEGO	74
02/19/16	DEPOSITION	ROSALES V TRAFFIKS		KASSEL, SANFORD	FP&H	
02/22/16	DEPOSITION	VARGAS, JOSE V FMI INC		MARTINETTI, RON	FP&H	
02/23/16	DEPOSITION	SIVARAJAH, MEERA V. JACQUELINE PECK		ROBERTS, LYSSA	LOS ANGELES	
02/24/16	DEPOSITION	MOORE, LESLIE V. BUY.COM, INC.		SHEGERIAN, CARNEY R.	COSTA MESA	
02/25/16	DEPOSITION	NAVARRO, JACKSON V. DR. BAILONY/SHARP CHULA VISTA MED CTR		LAW, PATRICIA	FP&H	
02/29/16	TESTIMONY	DeWITT, TIMOTHY CAMERON V. EDMOND MUSHEGYAN, ET AL.	BC470993	OSTLER, BRIAN	TORRANCE	11
03/03/16	TESTIMONY	ROTHMAN, CANDICE		DORDICK, GARY A.	SANTA MONICA	R
03/09/16	TESTIMONY	STUBBLEFIELD V. FOUR CORNERS INVESTMENTS		SIMON, BRAD	SANTA MONICA	M
03/10/16	TESTIMONY	ALCALA, MARIA V. CITY OF L.A.		LEBOVITS, MOSES	CHATSWORTH	47
03/14/16	TESTIMONY	NAVARRO, JACKSON V. DR. BAILONY/SHARP CHULA VISTA MED CTR		LAW, PATRICIA	SAN DIEGO	C-26
03/15/16	TESTIMONY	RECINTO, ARMANDO V. EVA DOVER	669379	SPELL, SCOTT	SANTA ANA	C-32
03/16/16	DEPOSITION	SEARGEANT-BARON V. UCLA		SHEGERIAN, CARNEY R.	LOS ANGELES	
03/22/16	DEPOSITION	REYLEK, BRADLEY AND PAMELA V. MARY KALAFUT, M.D., ET AL.	0007557CU	NELSON, VIRGINIA	FP&H	
03/23/16	DEPOSITION	GHAEMI, ARASH V. RALPHS	BC558198	SHEGERIAN, CARNEY R.	IRVINE	
03/24/16	DEPOSITION	PLENT, EILEEN V. ALBERTSONS	BC551113	FRENCH, JESSE	FP&H	
03/30/16	DEPOSITION	COMPEAN, CYNTHIA V. SEARS, ROEBUCK & CO.	1220049925	CHESSUM, LINDSEY	IRVINE	
04/11/16	DEPOSITION	ALVOR, CORAZON VS COUNTY OF LOS ANGELES	BC543100	LONG, GAVIN	FP&H	
04/14/16	TESTIMONY	PLENT, EILEEN V. ALBERTSONS	BC551113	FRENCH, JESSE	PASADENA	R
04/15/16	DEPOSITION	MIRANDA, RAELEN V PETER J ROBINSON M.D.	BC493083	MC MAHAN, CARL A.	HERE	

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DATE	EVENT	CASE	CASE #	ATTORNEY	LOCATION	DEPT
04/19/16	DEPOSITION	MOLINA, ET AL. V. CITY OF VISALIA	1:13-CV-01991	FRENCH, JESSE	VISALIA	
04/20/16	DEPOSITION	ANTHONY E. V. THE COUNTY OF SAN BERNARDINO, ET AL.	CIVDS1112961	KOSKOFF, RICHARD	FP&H	
04/20/16	DEPOSITION	RAHEEM O. V. THE COUNTY OF SAN BERNARDINO, ET AL.	CIVDS1112961	KOSKOFF, RICHARD	FP&H	
04/21/16	ARBITRATION	COMPEAN, CYNTHIA V. SEARS, ROEBUCK & CO.	1220049925	CHESSUM, LINDSEY	ORANGE	
04/22/16	DEPOSITION	DOMINGOS V. MC JUNKIN RED MAN CORP, ET AL.		OSBORN, TIMOTHY	FP&H	
04/25/16	DEPOSITION	DELFIN V. THE COUNTY OF LOS ANGELES	MC024959	WHEELER, ALEX	FP&H	
04/26/16	DEPOSITION	SULLIVAN V. TABAR		ROWELL, JOHN	BURBANK	
04/29/16	DEPOSITION	BRUMMITT V. ORANGE UNIFIED SCHOOL DISTRICT		LETIZIA, CLARICE	HUNTINGTON BEACH	
05/04/16	DEPOSITION	HUERTA V. HOTEL-BEL AIR	BC554145	SHEGERIAN, CARNEY R.	FP&H	
05/05/16	DEPOSITION	COATES V. SCANTIBODIES LABORATORIES, ET AL.		LETIZIA, CLARICE	SAN DIEGO	
05/11/16	DEPOSITION	LOPEZ V. CITY OF LYNWOOD		SHEGERIAN, CARNEY R.		
05/23/16	DEPOSITION	NUNEZ-AGUIRRE AND ALANIZ V. WHITECAP CONST SUPPLY, INC., ET	746710	EDSON, CARLY	FP&H	
05/26/16	TESTIMONY	HUERTA V. HOTEL-BEL AIR		SHEGERIAN, CARNEY R.	LOS ANGELES	72
05/27/16	DEPOSITION	WU, EMILY V. TABSH, M.D.		HINMAN, JOHN	FP&H	
06/06/16	TESTIMONY	GREY, BRANDON V. AMERICAN MANAGEMENT SERVICES		SHEGERIAN, CARNEY R.	LOS ANGELES	19
06/14/16	TESTIMONY	GREY, BRANDON V. AMERICAN MANAGEMENT SERVICES (CONT)		SHEGERIAN, CARNEY R.	LOS ANGELES	19
06/17/16	DEPOSITION	IBRAHIM, SHERIH V. CVS RX SERVICES	06372-FMO-JC	SHEGERIAN, CARNEY R.	IRVINE	
06/20/16	DEPOSITION	GUNST, SHEILA V. COAST SURGERY CENTER	BC 556 362	SHEGERIAN, CARNEY R.	LOS ANGELES	
06/21/16	DEPOSITION	PORTER, ET AL V. WYNER, ET AL.		BIBBERO, IRA	LOS ANGELES	
07/06/16	DEPOSITION	STOKES, JAMES VS MUSCHINSKE	MC025199	BURUNSUZYAN, MARO	GLENDALE	
07/15/16	DEPOSITION	DOMINGUEZ V. CYTEC INDUSTRIES, ET AL.	BC533123	RAMSEY, BRIAN	CERRITOS	
07/20/16	DEPOSITION	DIETZ, MADELINE V. ADELIN	BC555757	BRUSAVICH, BRUCE	FP&H	
07/25/16	DEPOSITION	THOMAS, MICHELLE & ALEXIS V. SHERRY, JOHN GREGORY, ET AL.		SHAPIRO, DAVID, B	FP&H	
07/27/16	DEPOSITION	MORGAN, ELLEN AND RICHARD GARCIA V. PRE-CON AND SPILLMAN CO		CLARK, MATTHEW	LOS ANGELES	
08/17/16	DEPOSITION	METZ, NICHOLAS (DEC'D) V. LOVE COUNTRY STORES OF CALIFORNIA	VCU262573	RITSEMA, SCOTT A.	FP&H	
08/18/16	DEPOSITION	DE CASSIA DE SOUZA GUEDES, RITA V. GARO KASSABIAN, MD, ET A	SC114596	HERZOG, IAN	LOS ANGELES	
08/23/16	DEPOSITION	PALMA V. RITE AID CORPORATION		SHEGERIAN, CARNEY R.	LOS ANGELES	



**TAMORAH HUNT**

**2016**

DATE	EVENT	CASE	CASE #	ATTORNEY	LOCATION	DEPT
08/25/16	DEPOSITION	PATTERSON V. PEACHY DEVELOPMENT CALIFORNIA		WHEELER, ALEX	FP&H	
08/29/16	DEPOSITION	PACHECO, DALILAH MICAYLA GONZALEZ V HISHMEH ENTERPRISES	259965	DUNBAR, DANIEL	FP&H	
08/30/16	TESTIMONY	WU, EMILY V. TABSH, M.D.	BC116406	HINMAN, JOHN	LOS ANGELES	57
08/31/16	TESTIMONY	SULLIVAN V. TABAR		ROWELL, JOHN	BELLFLOWER	5
09/08/16	DEPOSITION	VARGAS V. AL GILBERT COMPANY	MCV069795	DAVID K. COHN	FP&H	
09/13/16	DEPOSITION	JIMENEZ, ROBERT V. GENLYTE	114CV270931	PAUL B. KEMP	SAN JOSE	
09/15/16	TESTIMONY	PALMA V. RITE AID CORPORATION		SHEGERIAN, CARNEY R.	LOS ANGELES	
09/19/16	DEPOSITION	RODRIGUEZ, MANUEL V. FITNESS INTERNATIONAL & CORE INDUSTRIES	BC532963	BEECHER, BRIAN	FP&H	
09/21/16	TESTIMONY	STOKES, JAMES VS MUSCHINSKE	MC025199	MARO BURUNSUZYAN	CHATSWORTH	
09/26/16	DEPOSITION	VELUZ-ABRAHAM V. COUNTY OF LOS ANGELES, ET AL.	BC511286	SCOTT H. CARR	SANTA MONICA	
10/03/16	TESTIMONY	VARGAS V. AL GILBERT COMPANY	MCV069795	DAVID K. COHN	MADERA	
10/04/16	DEPOSITION	RAUST, KEVIN V. BCI COCA COLA BOTTLING COMPANY OF L.A.	15CV000087	MARK BOSKOVICH	SAN JOSE	
10/05/16	DEPOSITION	WEBB, SYLVIA V. CITY NATIONAL BANK	BC 591196	SHEGERIAN, CARNEY R.	LOS ANGELES	
10/07/16	DEPOSITION	EARHART, JEREMY VS AUTOZONE		CHRIS KANNE	FP&H	
10/17/16	DEPOSITION	KESHISHYAN, HAIK V HRC FERTILITY	BC544236	BALABAN, DANIEL	LOS ANGELES	
10/18/16	DEPOSITION	CUTHBERTSON, MICHAEL V A-1 RECYCLING AND WASTE	HG 14745895	FOWLER, JASON	FP&H	
10/20/16	DEPOSITION	OCHOA, JOAQUIN AND IMELDA MORENO V. JESUS F. DERADO		BOYADZHYAN, ARAKSYA	COSTA MESA	
10/20/16	DEPOSITION	BAKSH V. KAISER		LAW, PATRICIA	FP&H	
10/27/16	DEPOSITION	MUNOZ, ELIAS V. AMTRAK		WEIDMANN, MARK	IRVINE	
10/28/16	DEPOSITION	MASON V. CHEVRON	BC554337	SHEGERIAN, CARNEY R.	LOS ANGELES	
10/28/16	DEPOSITION	FOLEY, JAMES V. CHEVRON	BC553826	SHEGERIAN, CARNEY R.	LOS ANGELES	
10/31/16	DEPOSITION	SABO, CYNTHIA VS ESTATE OF JANET HAWES	BC512566	FOWLER, JASON	FP&H	
11/02/16	ARBITRATION	BAKSH V. KAISER		LAW, PATRICIA	LOS ANGELES	4000
11/08/16	DEPOSITION	VERRAZONO, GARY V. GEHL COMPANY, ET AL.	BC540325	LANZETTA, TOBIN	FP&H	
11/08/16	DEPOSITION	SERENA, ANTHONY V. COUNTY OF LOS ANGELES	BC542772	CLAYTON, ROBERT	FP&H	
11/10/16	DEPOSITION	BARRERA, BLAS V. MIGUEL MURILLO	BC546676	ROWELL, JOHN	GLENDALE	
11/15/16	DEPOSITION	BOZICH V. FIREMAN'S FUND INSURANCE COMPANY		HINRICHSSEN, PATRICK L.	ROSEVILLE	

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**2016**

DATE	EVENT	CASE	CASE #	ATTORNEY	LOCATION	DEPT
11/15/16	DEPOSITION	ISHIBASHI, LAVERNE V. CSAA INSURANCE EXCHANGE		HINRICHSSEN, PATRICK L.	SACRAMENTO	
11/16/16	DEPOSITION	DELANGE, NANCY V. SILVER OAKS LLC	PC053652	MILLER, LARRY	FP&H	
11/18/16	DEPOSITION	CHOJOLAN, JOSE V CALIFORNIA HOSPITAL MEDICAL CENTER	BC 503410	STERN, GARY N.	IRVINE	
12/01/16	ARBITRATION	BOZICH V. FIREMAN'S FUND INSURANCE COMPANY		HINRICHSSEN, PATRICK L.	SACRAMENTO	
12/02/16	DEPOSITION	MITCHELL, TALBERT V SEIU LOCAL #721	BC575572	SHEGERIAN, CARNEY R.	LOS ANGELES	
12/05/16	DEPOSITION	LUMAN, DAVID V GARRETT STILSON	MC025560	FOWLER, JASON	FP&H	
12/06/16	DEPOSITION	BELTRAN, JAIME V HOME DEPOT	283696-LHB	MC ELROY, STEPHEN	LOS ANGELES	
12/07/16	DEPOSITION	COYLE V. UC REGENTS AND DALLAS ROVERSTEIN (UC RIVERSIDE)		HASHMALL, JENNIFER	FP&H	
12/19/16	DEPOSITION	TORRES V. PHAM, MD		MC MAHAN, CARL A.	FP&H	
12/21/16	DEPOSITION	NUNEZ, JOSE V. PAK	BC586700	SCHECHTER, BRUCE	FP&H	



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**2015**

DATE	EVENT	CASE	CASE #	ATTORNEY	LOCATION	DEPT
01/07/15	DEPOSITION	SHEIKH V. LUFTHANSA		BURKES, JENNIFER	PASADENA	
01/08/15	DEPOSITION	TRUMP V. LAKESIDE MEDICAL GROUP		CURRAN, ALICIA	LOS ANGELES	
01/14/15	DEPOSITION	LOMELI, JOSE (McALLISTER) V. ARROW TRUCKS SALES INC., ET AL.		SHEGERIAN, CARNEY	LOS ANGELES	
01/14/15	DEPOSITION	LOMELI, JOSE V. ARROW TRUCKS SALES INC., ET AL.		SHEGERIAN, CARNEY	LOS ANGELES	
01/15/15	DEPOSITION	GARCIA, MIGUEL V. THE PEP BOYS MANNY MOE & JACK OF CALIF	BC527421	FOLINSKY, MARNI	FP&H	
02/03/15	DEPOSITION	KHALIL, VICTOR V. DEPARTMENT OF CORRECTIONS	02087SVWSPX	SOREM, EVAN	FP&H	
02/04/15	DEPOSITION	BILLAL V. ALERE HEALTH, LLC		STILLWELL, GENIENE	IRVINE	
03/06/15	DEPOSITION	RODRIGUEZ, KENDRA V. HAMPTON, ET AL.		RITSEMA, SCOTT	SANTA ANA	
03/10/15	DEPOSITION	DE JESUS, JEREMIAH V CVS CORPORATION	BC515624	SHEGERIAN, CARNEY	IRVINE	
03/11/15	DEPOSITION	HUERTA, MAGGY V. PACESETTER, INC.	BC526645	FOLINSKY, MARNI	FP&H	
03/16/15	DEPOSITION	CORDOVA, CYNTHIA V. LITTLE COMPANY OF MARY HOSPITAL, ET AL NC 044524		VAAGE, ROBERT	SAN DIEGO	
03/23/15	TESTIMONY	LOMELI, JOSE V. ARROW TRUCKS SALES INC., ET AL.		SHEGERIAN, CARNEY	LOS ANGELES	39
03/31/15	DEPOSITION	GAMMILL, MARGUERITE, ET AL. V. WILLIAM H. DAVIDSON, MD, ET AL 37-2013-00074031		GELFAND, GARY	FP&H	
04/03/15	DEPOSITION	VAZQUEZ V. ATRIUM DOOR AND WINDOW AND GARY HOFFMAN		SHEGERIAN, CARNEY	LOS ANGELES	
04/13/15	TESTIMONY	THOMAS V. CITY OF LOS ANGELES		SHEGERIAN, CARNEY	LOS ANGELES	31
04/17/15	DEPOSITION	SIKORSKI, LENORE VS. WILL SCHOBERT M.D.		FRENCH, JESSE	FP&H	
04/20/15	DEPOSITION	PARRA V. RIVERSIDE TRANSPORTATION AUTHORITY, ET AL		RITTER, DWIGHT	FP&H	
04/22/15	DEPOSITION	ANTEMATE V ESTENSON LOGISTICS		SZETO, KITTY	FP&H	
04/27/15	DEPOSITION	CARDONA, IRENE V. CORTES		FOWLER, JASON	FP&H	
04/27/15	DEPOSITION	CARDONA, JOSE V CORTES		FOWLER, JASON	FP&H	
04/29/15	ARBITRATION	SIKORSKI, LENORE VS. WILL SCHOBERT M.D.		FRENCH, JESSE	LOS ANGELES	250
05/11/15	DEPOSITION	GARCIA, GUSTAVO VS WILLIAM BOLTHOUSE FARMS		BEHLING, JEANNE	BAKERSFIELD	
05/27/15	DEPOSITION	BREWINGTON, STEPHEN V. VA HOSPITAL		CURRAN, ALICIA	FP&H	
05/27/15	DEPOSITION	AHMAD, HAZEL V. AMERICAN MEDICAL RESPONSE, INC., ET AL.	RIC1210559	ALEXANDER, MARY	IRVINE	
05/28/15	DEPOSITION	WYRICK, BRENT V TOYOTA MOTOR SALES		SCHUH, JON	FP&H	
06/03/15	DEPOSITION	TENT, LISA V. MICHAEL ANGER		MC ELROY, STEPHEN	FP&H	
06/08/15	TESTIMONY	CARDONA, IRENE V. CORTES		WHEELER, ALEX	LOS ANGELES	316

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DATE	EVENT	CASE	CASE #	ATTORNEY	LOCATION	DEPT
06/08/15	TESTIMONY	CARDONA, JOSE V CORTES		WHEELER, ALEX	LOS ANGELES	316
06/18/15	DEPOSITION	KINARD, NIESHA VS HARBOR UCLA MEDICAL CENTER		WHITE, TWILA	FP&H	
06/22/15	TESTIMONY	ADAME V. ALCOA		SHEGERIAN, CARNEY	LOS ANGELES	31
06/23/15	DEPOSITION	LEGGINS, ROBERT V. RITEAID		SHEGERIAN, CARNEY	LOS ANGELES	
06/25/15	DEPOSITION	HILL, SIMONE VS NATIONAL RAILROAD PASSENGER CORP	14-CV-0713 JGB	LIPINSKY, DAREN	LOS ANGELES	
06/26/15	TESTIMONY	TENT, LISA V. MICHAEL ANGER		MC ELROY, STEPHEN	VENTURA	41
06/30/15	DEPOSITION	KHOURY, SARKIS V. LISA ANN HAYES	RIC1307965	SERRANO, JOHN	FP&H	
07/13/15	TESTIMONY	LEGGINS, ROBERT V. RITEAID		SHEGERIAN, CARNEY	LOS ANGELES	62
07/13/15	TESTIMONY	CORDOVA, CYNTHIA V. LITTLE COMPANY OF MARY HOSPITAL, ET AL NC 044524		VAAGE, ROBERT	LONG BEACH	S29
07/16/15	DEPOSITION	HARRIS, DONALD V. HARVEL PLASTICS	CV-278694	CLARK, MATTHEW	LOS ANGELES	
07/17/15	TESTIMONY	LEGGINS, ROBERT V. RITEAID		SHEGERIAN, CARNEY	LOS ANGELES	62
07/29/15	DEPOSITION	CALZADA, MARIO V FAIRFIELD EMERALD TERRACE, TAMARA MARTIN	BC498463	MC ELROY, STEPHEN	FP&H	
08/05/15	DEPOSITION	CASTANEDA, RUBEN V. TOMMY ALEJANDRO ALVARADO, ET AL.		SMITH, MARC	FP&H	
08/05/15	DEPOSITION	LIGGINS V. ARCHDIOCESE OF LOS ANGELES	BC522726	SHEGERIAN, CARNEY	FP&H	
08/07/15	DEPOSITION	CICCARELLI, THOMAS V INLAND VALLEY MEDICAL CENTER		BUNCH, BRUCE	FP&H	
08/19/15	DEPOSITION	GANTNER, JACQUELINE V. LEMONADE RESTAURANT GROUP, LLC		SHEGERIAN, CARNEY	PASADENA	
09/17/15	TESTIMONY	FISCHMANN V. WESTERN MEDICAL CENTER, ET AL	602583	PAOLI, WILLIAM	SANTA ANA	C23
09/22/15	DEPOSITION	CHULAREE V. THE COOKSEN CO., MCKENDRY DOOR SALES, ET AL.		FEANZA, CHRISTOPHER	FP&H	
09/23/15	DEPOSITION	LUCIO V. LOCKHEAD		SHEGERIAN, CARNEY	LOS ANGELES	
09/28/15	TESTIMONY	STANKO V. WASTE MANAGEMENT		SPELL, SCOTT	MURIETTA	
09/30/15	TESTIMONY	SIMERS, T.J. V. TRIBUNE COMPANY		SHEGERIAN, CARNEY	LOS ANGELES	
10/12/15	DEPOSITION	DeWITT, TIMOTHY CAMERON V. EDMOND MUSHEGYAN, ET AL		OSTLER, BRIAN	LOS ANGELES	
10/13/15	DEPOSITION	WILLIAMS, TROY V. RALPHS		SHEGERIAN, CARNEY	IRVINE	
10/15/15	DEPOSITION	STUBBLEFIELD V. FOUR CORNERS INVESTMENTS		SIMON, BRAD	FP&H	
10/16/15	DEPOSITION	ROTHMAN, CANDICE		DORDICK, GARY	LOS ANGELES	
10/19/15	DEPOSITION	MIKALA O. V. THE COUNTY OF RIVERSIDE		KOSKOFF, RICHARD	FP&H	
10/18/15	DEPOSITION	MUNDEN V. KAISER		LAW, PATRICIA	FP&H	



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DATE	EVENT	CASE	CASE #	ATTORNEY	LOCATION	DEPT
11/03/15	DEPOSITION	ANTEMATE V ESTENSON LOGISTICS		SZETO, KITTY	FP&H	
11/04/15	DEPOSITION	LUCERO, DANIEL V. THAIYANANTHAN		FRENCH, JESSE	FP&H	
11/05/15	DEPOSITION	ESPARZA, DAVID VS WALSH SHEA		BYRNES, CRAIG	FP&H	
11/05/15	DEPOSITION	ASTORGA, CESAR V SNAP ON		SHEGERIAN, CARNEY	FP&H	
11/06/15	ARBITRATION	MUNDEN V. KAISER		LAW, PATRICIA	SANTA ANA	
11/06/15	DEPOSITION	STRUTZENBERG, ROLF V STORM MANUFACTURING		SHEGERIAN, CARNEY	NEWPORT BEACH	
11/09/15	DEPOSITION	SHIN V. THE ROMAN CATHOLIC DIOCESE OF SAN BERNARDINO, ET AL.		FRENCH, JESSE	FP&H	
11/10/15	DEPOSITION	DE LEON V. FREGOSO, CITY OF NORWALK, ET AL.		DI MONDA, JOSEPH	LOS ANGELES	
11/11/15	DEPOSITION	MARRERO V. CEDAR SINAI MEDICAL CENTER, ET AL.		BRUSAVICH, BRUCE	FP&H	
11/12/15	DEPOSITION	ENRIQUEZ, GLENN V. AIRTOUCH CELLULAR		FARRAR, KIM	LOS ANGELES	
11/18/15	DEPOSITION	CHULAREE V. THE COOKSEN COMPANY, ET AL.		FEANZA, CHRISTOPHER	LOS ANGELES	
11/19/15	TESTIMONY	KHOURY, SARKIS V. LISA ANN HAYES		SERRANO, JOHN	RIVERSIDE	7
11/20/15	DEPOSITION	GARCIA V. PEEK		DENOVE, JACK	FP&H	
11/20/15	DEPOSITION	MC GERR, MICHAEL V. ARC BROADWAY, ET AL.		STERN, GARY	FP&H	
12/03/15	DEPOSITION	MENCHU V. CARL KARCHER ENTERPRISES		SHEGERIAN, CARNEY	NEWPORT BEACH	
12/07/15	DEPOSITION	FULTON V. CALTRANS		ESTEY, STEPHEN J.	SAN DIEGO	
12/09/15	DEPOSITION	HABEKOST V. CABCO, ET AL.	BC540399	FRENCH, JESSE	FP&H	
12/10/15	DEPOSITION	VALENZUELA, IGNACIO V. GENERAL MILLS, INC.		SHEGERIAN, CARNEY	SANTA ANA	
12/16/15	DEPOSITION	ROJAS, CARLOS V BREK MANUFACTURING	BC542572	SHEGERIAN, CARNEY	FP&H	
12/18/15	DEPOSITION	DAVILA, MARCOS, AGUILAR V. AMERICAN BUILDING		SHEGERIAN, CARNEY	FP&H	

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DATE	EVENT	CASE	CASE #	ATTORNEY	LOCATION	DEPT
01/02/14	TESTIMONY	ACOPA V. CAL TRANS, ET AL.		LAW, PATRICIA	SAN BERNARDINO	S35
01/02/14	TESTIMONY	LARDIZABAL, ABRAHAM V. STATE OF CALIFORNIA		DEAN, WARREN	SAN BERNARDINO	S35
01/08/14	DEPOSITION	STERN, RITA V KAISER	ADR 11905	DENOVE, JOHN F.	FP&H	
01/09/14	DEPOSITION	LE, ANH-TUN V. ORANGE COUNTY TRANSPORTATION AUTHORITY		CROSBY, WILLIAM	COSTA MESA	
01/14/14	TESTIMONY	ACOPA V. CAL TRANS, ET AL.		LAW, PATRICIA	SAN BERNARDINO	S35
01/16/14	DEPOSITION	CABANA, APRIL V STRYKER BIOTECH	BC465313	ARISTEI, J. CLARK	FP&H	
01/22/14	DEPOSITION	SANCHEZ V. VALASSIS		SHEGERIAN, CARNEY	LOS ANGELES	
01/23/14	TESTIMONY	PULIDO V. BLACK		SPELL, SCOTT	SAN BERNARDINO	
01/24/14	DEPOSITION	ZINZOW, KEICHA V SOS HOTEL	BC 439248	RUDOLFER, DAVID	LOS ANGELES	
01/27/14	TESTIMONY	JAKYMYSHYN V. DAP PRODUCTS		GORDON, ROGER L.	LOS ANGELES	31
01/28/14	DEPOSITION	STYNER V. FUENTES		LONG, GAVIN	FP&H	
02/03/14	TESTIMONY	NICKEL V. STAPLES		SHEGERIAN, CARNEY	LOS ANGELES	68
02/07/14	DEPOSITION	MACIAS, LILIA V. WELLA CORPORATION	BC497993	SCUDERI, ROBERT	FP&H	
02/13/14	TESTIMONY	STYNER V. FUENTES		LONG, GAVIN	RIVERSIDE	10
02/18/14	DEPOSITION	KING V. L.A.J. TRUCKING		ALDER, C. MICHAEL	IRVINE	
02/21/14	DEPOSITION	VILLEGAS, ET AL. V. SUBURBAN PROPANE, LP, ET AL.	SCV253159	OSBORN, TIMOTHY	FP&H	
03/05/14	ARBITRATION	STERN, RITA V KAISER	ADR 11905	DENOVE, JOHN F.	LOS ANGELES	250
03/06/14	TESTIMONY	CAMPBELL, GLEN V. NFI INTERACTIVE LOGISTICS, LLC	GC049035	BURUNSUZAN, MARO	CHATSWORTH	F46
03/18/14	TESTIMONY	BELL V. SIMON PROPERTY GROUP AND ORANGE CITY MILLS, LP		VOSELLER, STEVEN	SANTA ANA	
04/07/14	DEPOSITION	CASTANEDA V. INDIVIDUAL FOOD SERVICE	BC 500970	SHEGERIAN, CARNEY	LOS ANGELES	
04/10/14	TESTIMONY	KING V. L.A.J. TRUCKING		ALDER, C. MICHAEL	PALM SPRINGS	PS1
04/11/14	TESTIMONY	KAHN, BRIAN V DEWEY GROUP	BC4544443	STEELE, EUGENIA L.	LOS ANGELES	48
04/28/14	DEPOSITION	SNELSON V. LIVE OAK COJEN	S1500CV278406	CLARK, MATTHEW	BAKERSFIELD	
04/30/14	DEPOSITION	GALAVIZ V. ST. FRANCIS HOSPITAL MEDICAL CENTER, ET AL.		MC MAHAN, CARL	FP&H	
05/01/14	TESTIMONY	BARROS V. SIMON PROPERTY GROUP, INC.		BAXTER, SAM	SANTA ANA	10C
05/01/14	DEPOSITION	WITTENBERG, JOSEPHINE V MOLINA HEALTH CARE INC.	NC057284	ASHKINADZE, REGINA	COSTA MESA	
05/07/14	DEPOSITION	SAMPSON, GINN V. PERCY MARES, ET AL.	BC494021	THALHEIMER, BERNARD	FP&H	



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DATE	EVENT	CASE	CASE #	ATTORNEY	LOCATION	DEPT
05/19/14	DEPOSITION	CERKONEY V VERIZON		WHEELER, ALEX	LOS ANGELES	
06/30/14	DEPOSITION	CAPIL V. HEALTHMARKETS, ET AL.	110CV188480	STUART, ANTHONY	LOS ANGELES	
06/30/14	DEPOSITION	WALLEN V. ALLSTATE INSURANCE CO.		TAYLOR, JOHN C.	LOS ANGELES	
07/08/14	DEPOSITION	LANDERS, VICTORIA V. KAISER AND SOUTHWEST WASHINGTON		ALCH, THOMAS	FP&H	
07/10/14	DEPOSITION	BROWN, MARIE V LA COUNTY, DEPT OF CHILDREN & FAMILY SERVIC BC499438		LYON, GEOFFREY	TARZANA	
07/11/14	DEPOSITION	PELEG, AMIR V. NEIMAN MARCUS		SHEGERIAN, CARNEY	SANTA MONICA	
07/16/14	DEPOSITION	HEDAYATI V. VAN WYK		BASSELL, TORSTEN	FP&H	
07/21/14	TESTIMONY	PETKUS, PAUL V BNSF RAILWAY CO.	CIVBS1100560	STOLPMAN, THOMAS	SAN BERNARDINO	S24J
07/22/14	DEPOSITION	MAZZONE, RUTH V. SUSAN QUINN	GC049816	COUNTS, STEPHEN	FP&H	
07/29/14	DEPOSITION	HUSTON V. BMI		SHEGERIAN, CARNEY	LOS ANGELES	
08/01/14	DEPOSITION	MARTINEZ, MARIA v. RITE AID, INC.		SHEGERIAN, CARNEY	BURBANK	
08/11/14	TESTIMONY	BROWN, MARIE V LA COUNTY, DEPT OF CHILDREN & FAMILY SERVICES		LYON, GEOFFREY	LOS ANGELES	56
08/11/14	TESTIMONY	HEDAYATI V. VAN WYK		BASSELL, TORSTEN	SANTA ANA	CX 105
08/12/14	DEPOSITION	GOENAWAIN, BRUCE V JACK'S TIRE AND OIL	1500-CV-279282	COHN, DAVID K.	PASADENA	
08/12/14	DEPOSITION	MASON, MARK V JACK'S TIRE AND OIL	1500-CV-279282	COHN, DAVID K.	PASADENA	
08/14/14	DEPOSITION	ROBINSON, STEPHANIE V. SHARP HEALTH CARE, ET AL.	37-2013-00029558	VAAGE, ROBERT	FP&H	
08/21/14	DEPOSITION	CALDERON V. UNION BANK		SHEGERIAN, CARNEY	LOS ANGELES	
08/25/14	DEPOSITION	JONES, LORETTA V. DUSTIN ROBINSON AND WILBERT ELLIS COMPA S-1500-CV-277681		FOWLER, JASON	FP&H	
08/29/14	DEPOSITION	NUCKOLS V. NU CO2 MANAGEMENT	37-2013-00051593	GLASSMAN, ROBERT	LONG BEACH	
09/03/14	TESTIMONY	PELEG, AMIR V. NEIMAN MARCUS		SHEGERIAN, CARNEY	LOS ANGELES	31
09/05/14	DEPOSITION	MEDINA, RICHARD V. THE DUTRA GROUP	CV13-04667	EASLEY, PRESTON	FP&H	
09/05/14	DEPOSITION	PADILLA (RUIZ) V. PAMPLONA		CURRAN, ALICIA	LOS ANGELES	
09/11/14	DEPOSITION	PRIDE, BRANDI V. DARL SPENCER	1500-CV-278493	DORDICK, GARY	FP&H	
09/15/14	TESTIMONY	PELEG, AMIR V. NEIMAN MARCUS		SHEGERIAN, CARNEY	LOS ANGELES	31
09/15/14	TESTIMONY	CORTEZ-SANCHEZ, JIMMY V. WACOLD, INC. ET AL.	EC59442	GAGLIANO, RICHARD	VAN NUYS	W
09/23/14	DEPOSITION	APARICIO V. HOME DEPOT		KRAKOW, MARVIN	COSTA MESA	
09/29/14	DEPOSITION	CIRILLO, JAKE THOMAS V. CHEROKEE FREIGHT LINES, ET AL.	YC068275	MARKS, LAWRENCE	LOS ANGELES	

**TAMORAH HUNT**

**2014**

DATE	EVENT	CASE	CASE #	ATTORNEY	LOCATION	DEPT
09/29/14	DEPOSITION	INTON, RENATO V BEOLIA	BC502056	SPELL, SCOTT	FP&H	
10/08/14	DEPOSITION	SYAL, SANJAY V. LINKES-HUNT		MC ELROY, STEPHEN	FP&H	
10/14/14	DEPOSITION	SIMERS, T.J. V. TRIBUNE COMPANY		SHEGERIAN, CARNEY	GLENDALE	
10/15/14	TESTIMONY	INTON, RENATO V BEOLIA		SPELL, SCOTT	LOS ANGELES	41
10/21/14	DEPOSITION	PETROPOULOS V. RADIO SHACK		SHEGERIAN, CARNEY	LOS ANGELES	
11/03/14	DEPOSITION	BUFFMAN V. CITY OF LOS ANGELES		CURRAN, ALICIA	LOS ANGELES	
11/05/14	DEPOSITION	ZEPEDA V. CENTRO DE SALUD DE LA COMUNIDAD		SHEGERIAN, CARNEY	SAN DIEGO	
11/06/14	DEPOSITION	GARCIA, JOSE LOUIS V TOYOTA		RITSEMA, SCOTT	FP&H	
11/07/14	TESTIMONY	HUSTON V. BMI		SHEGERIAN, CARNEY	LOS ANGELES	1600
11/12/14	TESTIMONY	STRAUSS V. UNITED STATES OF AMERICA		EASLEY, PRESTON	SAN DIEGO	5C
11/14/14	DEPOSITION	HURD, DEBRA V. AMERICAN INCOME LIFE INSURANCE CO., ET AL.		SHEGERIAN, CARNEY	LOS ANGELES	
11/17/14	DEPOSITION	TOUNKARA, ABDOULAYE V. SECURITAS SECURITY SERVICES		FOLINSKY, MARNI	FP&H	
11/19/14	TESTIMONY	BUFFMAN V. CITY OF LOS ANGELES		CURRAN, ALICIA	LOS ANGELES	31
11/26/14	TESTIMONY	MARTINEZ, MARIA v. RITE AID, INC.		SHEGERIAN, CARNEY	LOS ANGELES	68
12/02/14	DEPOSITION	DOE, JANE V. FOLSOM CORDOVA UNIFIED SCHOOL DISTRICT		ESTEY, STEPHEN	SAN DIEGO	
12/03/14	DEPOSITION	GREY, BRANDON V. AMERICAN MANAGEMENT SERVICES		SHEGERIAN, CARNEY	LOS ANGELES	
12/08/14	DEPOSITION	LOPEZ, BERTHA V. CARLOS DANUELOS, BCI COCA COLA BOTTLING		MGDESYAN, GEORGE	SHERMAN OAKS	
12/10/14	DEPOSITION	IGNAT V. YUM! BRANDS, INC.		ELSON, JOHN	LOS ANGELES	



**TIMOTHY LANNING**

**2018**

DATE	EVENT	CASE	CASE #	ATTORNEY	LOCATION	DEPT
1/11/2018	DEPOSITION	THE ESTATE OF GIZELLA BONYHADI V. NIFTY AFTER FIFTY	BC614824	WAGNER, DENNIS	FHL	
1/18/2018	TESTIMONY	LEE, KYOUNG V RICHARD TAN & DEPENDABLE HIGHWAY EXPRESS		DORDICK, GARY A.	LOS ANGELES	96
1/24/2018	TESTIMONY	ARMSTRONG, PENELOPE V COUNTY OF LOS ANGELES	BC528453	RODRIGUEZ, ROB	COMPTON	A
2/5/2018	DEPOSITION	MC CORMICK, BETTY V. SAMUAL CARDENES	BC 670746	BANAFSHEH, SEAN	FHL	
2/8/2018	DEPOSITION	ARMSTRONG, NANCY V ALEXIS CATHERINE BERNSTAN AND ROLAND		BULONE, CHRISTOPHER	FHL	
2/15/2018	DEPOSITION	JOHNSON, KELLY V. NATALIE MUMM	1469971	DISKIN, DIANA	BEVERLY HILLS	
2/16/2018	DEPOSITION	NUNEZ, RUBEN V. BOARD OF TRUSTEES OF THE CALIF STATE UNIVERSI	1613843	GARCIA, CHRISTOPHER	FHL	
2/20/2018	DEPOSITION	WINSTEAD V. RIVERSIDE COMMUNITY HOSPITAL AND DR. WAGNER		IODICE, MARK	FHL	
2/21/2018	TESTIMONY	HILL, JAMES V. TERYLYN WALTZ	RIC1411789	EISNER, ALEX	RIVERSIDE	3
3/7/2018	TESTIMONY	REIS, JOHN V. CITY OF CHINO HILLS, TIME WARNER NY CABLE LLC	1013457	CASILLAS, ARNALDO	SAN BERNARDINO	S29
3/12/2018	DEPOSITION	COLLETO V. MONTEREY		HORTON, PETER	FHL	
3/26/2018	DEPOSITION	LOPEZ, SALVADOR V. BETTER LIFE, ET AL.	BC636220	BOYADZHYAN, ARAKSYA	LOS ANGELES	
3/28/2018	TESTIMONY	ARMSTRONG, NANCY V ALEXIS CATHERINE BERNSTAN AND ROLAND		DORDICK, GARY A.	VISTA	N-31
4/11/2018	DEPOSITION	MALCOLM, ADAM V ROBINSON HELICOPTER		DEVERS, CYNTHIA	LOS ANGELES	
4/11/2018	DEPOSITION	BASEL, TIMOTHY V ROBINSON HELICOPTER		DEVERS, CYNTHIA	LOS ANGELES	
4/12/2018	TESTIMONY	LOPEZ, SALVADOR V. BETTER LIFE, ET AL.		BOYADZHYAN, ARAKSYA	VAN NUYS	I
4/26/2018	TESTIMONY	ALVAREZ, ELODIA V HEMET UNIFIED SCHOOL DISTRICT	BC 560870	MC ELROY, STEPHEN	LONG BEACH	S29
5/10/2018	DEPOSITION	RODRIGUEZ, ANDREW VS WALT DISNEY PARKS AND RESORTS	CV-01314-JLS	AL-CHALATI, DANIELLE	LOS ANGELES	
5/23/2018	DEPOSITION	RAMIREZ, JOSE V. PATRICIA MORRIS	BC 615448	LINDEMANN, BLAKE	LONG BEACH	
6/7/2018	DEPOSITION	VALENCIA, NISSA & VIGIL, MANNY V DOMINGUEZ		ECHEVERRIA, RICARDO	FHL	
6/18/2018	DEPOSITION	SWEETIN V. ROBINSON	RIC614860	WHITLOCK, LYNN	FHL	
6/20/2018	DEPOSITION	GALICIA V. SOUTHERN CALIFORNIA REGIONAL RAIL AUTHORITY	CV-08020-JFW	CLAYTON, ROBERT	MANHATTAN BEACH	
6/21/2018	TESTIMONY	NUNEZ, RUBEN V. BOARD OF TRUSTEES OF THE CALIF STATE UNIVERSI	1613843	GARCIA, CHRISTOPHER	SAN BERNARDINO	29
6/27/2018	DEPOSITION	HILL V. TEMECULA VALLEY HOSPITAL, ET AL.	MCC1600325	LAW, PATRICIA	FHL	
7/31/2018	DEPOSITION	LEON, KIMBERLY V. SHELL GAS STATION		BOYADZHYAN, ARAKSYA	FHL	
8/9/2018	DEPOSITION	HONORE, KEITH V. FEDERAL EXPRESS CORP, NANCY HANLON, ET AL.	BC596379	YUN, EDWARD	IRVINE	
8/14/2018	DEPOSITION	SHERER V KIM	BC575864	ABITANTA, SUE	SANTA MONICA	
8/16/2018	TESTIMONY	HILL V. TEMECULA VALLEY HOSPITAL, ET AL.	MCC1600325	LAW, PATRICIA	MURRIETA	302
8/27/2018	DEPOSITION	MOLINAR, DESTANY & JIMMY V CITY OF CLOVIS	17CECG00347	WATTERS, RICHARD C.	COSTA MESA	

**TIMOTHY LANNING**

**2018**

<b>DATE</b>	<b>EVENT</b>	<b>CASE</b>	<b>CASE #</b>	<b>ATTORNEY</b>	<b>LOCATION</b>	<b>DEPT</b>
9/6/2018	DEPOSITION	HOLMES, TERRY		DORDICK, GARY A.	LOS ANGELES	
9/7/2018	DEPOSITION	VAVRA, NEALV CARLOMA PARTNERS, MIRA LOMA JC LLC		KNYPSTRA, BRADLEY	FHL	
9/19/2018	TESTIMONY	HOLMES, TERRY		DORDICK, GARY A.	RIVERSIDE	6
9/28/2018	TESTIMONY	MOLINAR, DESTANY& JIMMY V CITY OF CLOVIS		WATTERS, RICHARD C.	FRESNO	54

**TIMOTHY LANNING**

**2017**

DATE	EVENT	CASE	CASE #	ATTORNEY	LOCATION	DEPT
1/17/2017	TESTIMONY	GARCIA, JAMES V. CITY OF CHULA VISTA		GAGE, BRADLEY C.	SAN DIEGO	61
1/18/2017	DEPOSITION	THORNBURG V. FAUNCE, SINGER & OATMAN, ET AL.	RIC1104353	TETLEY, FRANK	SANTA ANA	
1/23/2017	DEPOSITION	GINETT, GAIL V. KENTFIELD REHABILITATION HOSPITAL	CIV1402977	HILLYARD, STEVEN	SAN JOSE	
1/30/2017	TESTIMONY	NELSON V. SANCHEZ	VS1202206	BOYADZHYAN, ARAKSYA	SAN BERNARDINO	S 31
2/3/2017	DEPOSITION	BRIEN, DAVID		ROBERTS, LYSSA	LOS ANGELES	
2/10/2017	ARBITRATION	HIGUERA STOUT, PATRICIA V. DLA PIPER		MAKI, LISA	LOS ANGELES	400
2/15/2017	DEPOSITION	GORDIN-KAVIANI V. BECKER		STRID, LAWRENCE	FP&H	
2/17/2017	DEPOSITION	VITENTE, SOLLIE V. J.R. WELDING		KRISSMAN, JOEL	LONG BEACH	
2/21/2017	DEPOSITION	CASTILLOS, AMILCAR MAZARIEGOS V CERTIFIED FREIGHT		MC CANN, SHAWN	IRVINE	
2/23/2017	DEPOSITION	PUGA V. KAISER		DENOVE, JOHN	FP&H	
2/27/2017	TESTIMONY	SABBAGH, GHADA V. PYRAMID ADVISORS, LLC.	BC505211	SALEM, EDMOND	VAN NUYS	
3/2/2017	ARBITRATION	PUGA V. KAISER		DENOVE, JOHN	LOS ANGELES	450
3/13/2017	TESTIMONY	VITENTE, SOLLIE V. J.R. WELDING		KRISSMAN, JOEL	TORRANCERE	A
3/30/2017	DEPOSITION	OLIVAS-DEAN, TONY V AMERICAN MEIZHOU DONGPO GROUP INC.	BC581538	LYON, GEOFFREY	FP&H	
3/31/2017	DEPOSITION	WOOD, DONALD V SAN DIEGO METROPOLITAN TRANSIT SYSTEM	34512	KARLIN, L. SCOTT	TUSTIN	
4/4/2017	DEPOSITION	LARUE V. HEALTHNET, ET AL.		KERN, RENE	HERE	
4/10/2017	TESTIMONY	OLIVAS-DEAN, TONY V AMERICAN MEIZHOU DONGPO GROUP INC.		LYON, GEOFFREY	LOS ANGELES	46
4/14/2017	DEPOSITION	DUGGAL V. LENEXPO, INC. AND BEARCAT	261642	CORSIGLIA, BRADLEY M	SAN JOSE	
4/17/2017	DEPOSITION	GUERRERO, MARCOS		BANAFSHEH, SEAN	FP&H	
4/24/2017	TESTIMONY	OLIVAS-DEAN, TONY V AMERICAN MEIZHOU DONGPO GROUP INC.		LYON, GEOFFREY	LOS ANGELES	46
4/28/2017	TESTIMONY	LARUE V. HEALTHNET, ET AL.		KERN, RENE	LOS ANGELES	55
5/3/2017	DEPOSITION	BROOKS, JAMES V. DR. STEVEN SORENSON AND DR. FORTUNA		SIMPSON, JAYME	FP&H	
5/4/2017	DEPOSITION	GREEN, TIMOTHY PATRICK V. CITY OF SOUTH PASADENA		TAYLOR, MORSE	LOS ANGELES	
5/30/2017	DEPOSITION	REIS, JOHN V. CITY OF CHINO HILLS, ET AL.	1013457	CASILLAS, ARNALDO	IRVINE	
5/30/2017	DEPOSITION	GOLCHET, PAMELA V. ANDREW HARWOOD	BC537467	ROBERTS, LYSSA	FP&H	
5/31/2017	DEPOSITION	BRISENO V. BARLOW HOSPITAL	BC588396	LYON, GEOFFREY	LOS ANGELES	
6/6/2017	DEPOSITION	MEIER, STEVEN V. PENNYSaver USA, ET AL.	RIV1507069	HOBBS, KRISTIN	FP&H	
6/7/2017	DEPOSITION	BOLANOS, ANTONIO V. BIG LOTS INC.	BC 556996	TERAHOVA, EVGENIA	FP&H	
6/12/2017	DEPOSITION	LUNASCO V. DR. GARCIA, ET AL.	653823	BUNCH, BRUCE M.	FP&H	



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**2017**

DATE	EVENT	CASE	CASE #	ATTORNEY	LOCATION	DEPT
6/15/2017	DEPOSITION	SAMORA, ARTHUR V. YAHYA ASIMABOUL MUHAMMAD, TOTAL TRANSPORT		MC ELFISH, RAY	LOS ANGELES	
6/16/2017	DEPOSITION	ORTIZ, MARIA LUISA SOLIS V. JORGE ALBERTO GIRON, ET AL.		SMITH, DEAN	FP&H	
6/21/2017	TESTIMONY	ARANGO V. ARNOLD, ET AL.	103745	SALEM, EDMOND	SAN DIEGO	74
6/28/2017	TESTIMONY	MEIER, STEVEN V. PENNYSAYER USA, ET AL.	RIV1507069	ECHEVERRIA, RICARDO	RIVERSIDE	10
6/30/2017	DEPOSITION	KENWORTHY V. NEW SHOGUN RESTAURANT, ET AL.	809340	IVES, ROBERT	COSTA MESA	
7/10/2017	TESTIMONY	SAMORA, ARTHUR V. YAHYA ASIMABOUL MUHAMMAD, TOTAL TRANSPORT		MC ELFISH, RAY	LONG BEACH	S10
7/12/2017	TESTIMONY	PEARSON, LARRY V. ERIC LIN		NISSEN, ANDREW	SANTA ANA	
7/17/2017	DEPOSITION	MARTEL, PHILLIP V MK DIAMOND PRODUCTS, INC		WAECHTER, ROBERT	FP&H	
7/19/2017	TESTIMONY	GUERRERO, MARCOS		BANAFSHEH, SEAN	SAN BERNARDINO	S32
7/21/2017	TESTIMONY	ORTIZ, MARIA LUISA SOLIS V. JORGE ALBERTO GIRON, ET AL.		SMITH, DEAN	PASADENA	R
8/7/2017	DEPOSITION	WARE, BARRY V. JKM EQUIPMENT INC. & JOHN MITZEL	30-201500827	GARCIA, CHRISTOPHER	CHINO	
8/8/2017	DEPOSITION	BETKEY V. COUNTY OF LOS ANGELES	CV16-5863	GAGE, BRADLEY	WOODLAND HILLS	
8/10/2017	DEPOSITION	CORRAL, MELISSA V. HOLLYWOOD HEALTH CENTER, ET AL.	BC 595760	MC MURRAY, RANDY	FP&H	
8/14/2017	DEPOSITION	HOLLAUER, MARY V. PERMANENTE MEDICAL GROUP, ET AL.	15CCG02411	LYON, GEOFFREY	FRESNO	
8/15/2017	TESTIMONY	LIMA, CHRISTINA V CHRISTOPHER STEFFEY	BC573273	DORDICK, GARY	LONG BEACH	S10
8/17/2017	DEPOSITION	GRUNDFOR V. ATASCADERO STATE HOSPITAL		GAGE, BRADLEY	LOS ANGELES	
8/21/2017	DEPOSITION	CARBAJAL, JESS VS COUNTY OF ORANGE	688237	BENNETT, GARY	ORANGE	
8/31/2017	DEPOSITION	GARCIA, ANDREW V. CITY OF GARDEN GROVE	00154DOC	HENDERSON, KENT	FP&H	
9/6/2017	DEPOSITION	RODRIGUEZ, JUAN RAMON VS ELEANOR BARBOUR	BC607161	IBARRA, STEVEN	LONG BEACH	
9/8/2017	DEPOSITION	CRUSE, DOUGLASS & IVETA V. JACOB SWIGGER, ET AL.	BC602211	SEDRISH, LAURA	HERE	
9/18/2017	DEPOSITION	HUBBARD, LAURA V CORCORAN		KNYPSTRA, BRADLEY	FP&H	
9/21/2017	DEPOSITION	MOSLEY, ET AL. V. ROBINSON, ET AL.	758451	GOLEH, ARASH	SANTA MONICA	
9/26/2017	TESTIMONY	GREEN, TIMOTHY PATRICK V. CITY OF SOUTH PASADENA		MILLER, VINCENT	LOS ANGELES	45
9/27/2017	DEPOSITION	SOSA, CESAR V. DJI TECHNOLOGIES	BC614908	DORDICK, GARY	LOS ANGELES	
9/27/2017	TESTIMONY	HUBBARD, LAURA V CORCORAN		KNYPSTRA, BRADLEY	SANTA ANA	C-23
10/5/2017	DEPOSITION	REYNOLDS, JANET, ET AL. V. GRAYBILL MED GROUP, ET AL.	00004509CU	MARTEL, AMY	SAN DIEGO	
10/10/2017	TESTIMONY	WARE, BARRY V. JKM EQUIPMENT INC. & JOHN MITZEL		GARCIA, CHRISTOPHER	SANTA ANA	C-12
10/12/2017	DEPOSITION	GARCIA, TERESITA V LA COUNTY		SIMON, ROBERT	FP&H	
10/17/2017	DEPOSITION	YOUNG V. ORTIZ	851039	WACKER, TED	FP&H	

**TIMOTHY LANNING**

**2017**

DATE	EVENT	CASE	CASE #	ATTORNEY	LOCATION	DEPT
10/19/2017	DEPOSITION	ALVAREZ, ELODIA V HEMET UNIFIED SCHOOL DISTRICT	BC 560870	MC ELROY, STEPHEN K.	FP&H	
10/20/2017	DEPOSITION	LEVIN, APRIL V. MINACS GROUP USA	872438	GROBATY, MICHAEL	IRVINE	
10/23/2017	DEPOSITION	WARE, BARRY V. JKM EQUIPMENT INC. & JOHN MITZEL		GARCIA, CHRISTOPHER	CHINO	
10/23/2017	TESTIMONY	SOSA, CESAR V. DJI TECHNOLOGIES	BC614908	DORDICK, GARY	LOS ANGELES	62
10/24/2017	TESTIMONY	WARE, BARRY V. JKM EQUIPMENT INC. & JOHN MITZEL		LYON, GEOFFREY	SANTA ANA	C-12
10/27/2017	DEPOSITION	LOVING V. CALIFORNIA DEPARTMENT OF CORRECTIONS		GAGE, BRADLEY	LOS ANGELES	
11/2/2017	TESTIMONY	LOPEZ, JAVIER V. RICHARD OJIMA, MD	BC541689	HOFFMAN, DAVID	LOS ANGELES	33
11/9/2017	DEPOSITION	BUSCH, ANITA V. ANTHONY PELLICANO	BC316318	MARSHALL, EVAN	LOS ANGELES	
11/13/2017	DEPOSITION	FISHER V. CERVANTES	MC 025193	FOWLER, JASON	FP&H	
11/15/2017	DEPOSITION	LOOMIS, JONI V. RALPHS GROCERY COMPANY	BC556985	MC ELROY, STEPHEN K.	PASADENA	
11/20/2017	DEPOSITION	DUNEK, SANDRA V. BARAG, M.D. AND THUMATI, M.D., ET AL.	1504286	STOUT, DENNIS	FP&H	
11/21/2017	DEPOSITION	PARK, NICOLAS TAE, ET AL. V. MARTIN	BC597287	HOLLOMON, MICHAEL	FP&H	
11/27/2017	DEPOSITION	TROLAN, MICHAEL V. CALIFORNIA CEMETERY AND FUNERAL SERVICES		LYON, GEOFFREY	LOS ANGELES	
11/29/2017	TESTIMONY	TROLAN, MICHAEL V. CALIFORNIA CEMETERY AND FUNERAL SERVICES		LYON, GEOFFREY	LOS ANGELES	45
12/1/2017	TESTIMONY	LUNASCO V. DR. GARCIA, ET AL.		BUNCH, BRUCE M.	SANTA ANA	C-22
12/15/2017	DEPOSITION	HILL, JAMES V. TERYLYN WALTZ	RIC1411789	EISNER, ALEXANDER	FP&H	



**TIMOTHY LANNING**  
**2016**

DATE	EVENT	CASE	CASE #	ATTORNEY	LOCATION	DEPT
1/19/2016	DEPOSITION	MIGLAS, TOM V. A-ABLE, INC.	BC535908	BIREN, MATTHEW B.F.	LOS ANGELES	
2/3/2016	DEPOSITION	SAHOTA, TAAJ MALIK V. LINDSAY CRUZ	703363	DORDICK, GARY	IRVINE	
2/10/2016	DEPOSITION	GIVEHAND, ILDA VS MONTCLAIR HOSPITAL MEDICAL CENTER ET AL	1305503	RILEY, TERRENCE	FP&H	
2/17/2016	DEPOSITION	GODINEZ, ROSIE V ALTA DENA CERTIFIED DAIRY LLC		FOLINSKY, MARNI	SANTA MONICA	
3/1/2016	DEPOSITION	HERNANDEZ, MARISA V RANCHO SANTIAGO COMMUNITY COLLEGE	773691	SCUDERI, ROBERT	FP&H	
3/7/2016	TESTIMONY	GIVEHAND, ILDA VS MONTCLAIR HOSPITAL MEDICAL CENTER ET AL		RILEY, TERRENCE	SAN BERNARDINO	S-33
3/10/2016	TESTIMONY	GODINEZ, ROSIE V ALTA DENA CERTIFIED DAIRY LLC		FOLINSKY, MARNI	LOS ANGELES	21
3/18/2016	DEPOSITION	ROSALES V. FPI MANAGEMENT, INC. AND BARKER MANAGEMENT, INC.	BC551323	NALBANDYAN, JACOB	LOS ANGELES	
3/21/2016	DEPOSITION	LOPEZ, JAVIER V. RICHARD OJIMA, MD	BC541689	HOFFMAN, DAVID	FP&H	
3/30/2016	DEPOSITION	MARRON, KATHLEEN V. TOKYO MARINE MANAGEMENT INC.		VONDRA, PHILLIP	FP&H	
4/7/2016	DEPOSITION	MUELLER V. CRUZ, ORANGE COUNTY SHERIFF'S DEPT.		BROWN, ED	SANTA ANA	
4/14/2016	DEPOSITION	PROFFETT, GARY MD V. ALAN SCHOENGOLD, MD dba SEAVIEW IPA, ET A	459874	DOROGI, THOMAS	CAMARILLO	
4/18/2016	TESTIMONY	MIGLAS, TOM V. A-ABLE, INC.	BC535908	BIREN, MATTHEW B.F.	LOS ANGELES	25
4/29/2016	DEPOSITION	SABBAGH, GHADA V. PYRAMID ADVISORS, LLC.	BC505211	SALEM, EDMOND	FP&H	
5/3/2016	DEPOSITION	ALVAREZ, ERIKA, ET AL. V. AN-WIL, INC., ET AL.	RIC1408964	KISTLER, HARLAN	IRVINE	
5/4/2016	DEPOSITION	LOPEZ, SALVADOR		KIMES, SHAPLEIGH	LOS ANGELES	
5/16/2016	DEPOSITION	WEAVER V. CERRITOS FORD	JCCP4292	ETO, GARY	FP&H	
5/17/2016	DEPOSITION	BOSTICK, DORA V MAUREEN FEDAIL		WACKER, TED	NEWPORT BEACH	
5/19/2016	ARBITRATION	MARRON, KATHLEEN V. TOKYO MARINE MANAGEMENT INC.		VONDRA, PHILLIP	SANTA ANA	
5/25/2016	DEPOSITION	JOSEPH, ALFRED V. ANNA DELUCA	PSC1403764	CLARK, WALTER	RIVERSIDE	
5/26/2016	DEPOSITION	ORTEGA V. DIGNITY HEALTH DBA COMMUNITY HOSP, SAN BERNARDINO	BC 548153	MIRROKNIAN, REZA	HERE	
5/31/2016	DEPOSITION	DAVIS, BARRY V. COUNTY OF LOS ANGELES, ET AL.	BC557070	DENOVE, JOHN F.	HERE	
6/8/2016	TESTIMONY	ORTEGA V. DIGNITY HEALTH DBA COMMUNITY HOSP, SAN BERNARDINO		MIRROKNIAN, REZA	LOS ANGELES	74
6/9/2016	DEPOSITION	SMITH, STEVE & JESSICA V. GUTIERREZ		OWEN, GREGORY J.	LOS ANGELES	
6/16/2016	DEPOSITION	BROWN, ERIC V JOAN LANG LASALLE AMERICAS, INC.		SHERMAN, LISA	LOS ANGELES	
6/17/2016	TESTIMONY	WEAVER V. CERRITOS FORD	JCCP4292	ETO, GARY	LOS ANGELES	
6/20/2016	DEPOSITION	JEMISON, AMANDA AND MALISSA JEMISON V. KESSNER	BC544562	PARRIS, ASHLEY	FP&H	
6/21/2016	TESTIMONY	DAVIS, BARRY V. COUNTY OF LOS ANGELES, ET AL.	BC557070	DENOVE, JOHN F.	SANTA MONICA	G
6/23/2016	DEPOSITION	GARCIA, HECTOR V REPUBLIC BAG	MCC1400196	DENIS, DAVID	NEWPORT BEACH	



**TIMOTHY LANNING**

**2016**

DATE	EVENT	CASE	CASE #	ATTORNEY	LOCATION	DEPT
7/18/2016	TESTIMONY	JEMISON, AMANDA AND MALISSA JEMISON V. KESSNER		PARRIS, ASHLEY	LOS ANGELES	76
7/19/2016	DEPOSITION	LOPEZ, ERVIN V. OCHOA	RIC1412693	QUESADA, EDWARD	FP&H	
7/20/2016	DEPOSITION	WATERMAN, WINSON V US DEPARTMENT OF THE INTERIOR	5:15CV0019	LYON, GEOFFREY	FP&H	
7/28/2016	TESTIMONY	LITCH, CRAIG V DCOR	442884	HAWBECKER, ARIANNA	VENTURA	43
8/3/2016	DEPOSITION	SOLIZ, ORLANDO AND MARIA FERRADAS V. BIG BEAR	1409268	DORDICK, GARY	BEVERLY HILLS	
8/18/2016	DEPOSITION	STARBIRD, WENDY V. CITY OF LONG BEACH	BC541789	JENKINS, HALEH	BEVERLY HILLS	
8/23/2016	DEPOSITION	FUQUA, LISA ELAINE V. SANTA MONICA	BC527970	DORDICK, GARY	FP&H	
8/30/2016	DEPOSITION	ARANGO V. ARNOLD, ET AL.	103745	SALEM, EDMOND	FP&H	
9/1/2016	DEPOSITION	WASH V. UNITED NATURAL FOODS, INC.	RIC 1408063	MIRROKNIAN, REZA	FP&H	
9/8/2016	DEPOSITION	GUSTAFSON, JAMIE V. GLENWOOD VILLAGE HOMEOWNERS ASSOCIATION	RIC1305175	BIREN, MATTHEW B.F.	LOS ANGELES	
9/15/2016	TESTIMONY	KIM, SAMUEL V. ARSHAM BALTAYAN, COSTA MESA LINCOLN MERCURY	527824	LEE, JAE	SANTA ANA	
9/16/2016	DEPOSITION	PAWAR, AMARJIT V PATHWAY MEDICAL	750380	HOFFMAN, DAVID	FP&H	
9/20/2016	TESTIMONY	GARCIA, HECTOR V REPUBLIC BAG	MCC1400196	DENIS, DAVID	RIVERSIDE	7
9/21/2016	TESTIMONY	WASH V. UNITED NATURAL FOODS, INC.	RIC 1408063	MIRROKNIAN, REZA	PALM SPRINGS	PS2
9/26/2016	TESTIMONY	SOLIZ, ORLANDO AND MARIA FERRADAS V. BIG BEAR	1409268	DORDICK, GARY	SAN BERNARDINO	S32
10/3/2016	TESTIMONY	GARCIA, HECTOR V REPUBLIC BAG	MCC1400196	DENIS, DAVID	RIVERSIDE	
10/7/2016	DEPOSITION	ANAYA, DAVID		DANESH, KEVIN	FP&H	
10/24/2016	DEPOSITION	GARCIA, JAMES V. CITY OF CHULA VISTA		GAGE, BRADLEY	FP&H	
10/27/2016	DEPOSITION	DEFRIES-GARCIA, KRISTIE VS COMPLETE APPAREL SOLUTIONS INC.		LYON, GEOFFREY	NEWPORT BEACH	
11/8/2016	DEPOSITION	RIVAS, RAFAEL MARVIN V. UD TRUCK AND JERRDAN	CIV1302666	EHRlich, JUSTIN	LOS ANGELES	
11/28/2016	DEPOSITION	NELSON V. SANCHEZ	CIV1202206	BOYADZHYAN, ARAKSYA	SHERMAN OAKS	
12/12/2016	DEPOSITION	HIGUERA STOUT, PATRICIA V. DLA PIPER		MAKI, LISA	NEWPORT BEACH	
12/13/2016	TESTIMONY	SMITH, STEVE & JESSICA V. GUTIERREZ		OWEN, GREGORY J.	LOS ANGELES	38

**TIMOTHY LANNING**  
**2015**

DATE	EVENT	CASE	CASE #	ATTORNEY	LOCATION	DEPT
1/12/2015	TESTIMONY	PAPINI V. VAN METER, ET AL.		PURDY, COURT	SANTA ANA	C-12
1/18/2015	DEPOSITION	CAMPA V. CATHOLIC HEALTHCARE WEST		SCHIAVONE, RANDALL	FP&H	
1/29/2015	TESTIMONY	CHOBO, AMANDA V. RIVERSIDE COUNTY REGIONAL MEDICAL CENTER		MAYNES, ROGER	RIVERSIDE	1
2/2/2015	DEPOSITION	VAZQUEZ-RAMOS, ARMANDO V. CITY OF LONG BEACH		ESTES, RYAN	LONG BEACH	
2/5/2015	TESTIMONY	AULT V. YAMAHA		PANCER, IAN	SANTA ANA	CX-104
3/9/2015	TESTIMONY	MARCHESINI V. CASSUTO		DRUCKER, BARRY	LOS ANGELES	57
4/6/2015	DEPOSITION	GALLEGOS, JAMES V. HAVANA HOUSE	BC508561	GOLDBERG, TERRY	FP&H	
4/8/2015	DEPOSITION	VALLEJO, CARLOS V BERG ELECTRIC		KHORSHIDI, OMID	LOS ANGELES	
4/9/2015	DEPOSITION	CINTURA, WAYNE V. SULLIVAN AUTOMOTIVE GROUP, LLC, ET AL		SOKOLOFF, STEVEN	FP&H	
4/16/2015	DEPOSITION	LAVIN/SANDOVAL V. GOODRICH		FIOLA, DALE	LOS ANGELES	
4/17/2015	TESTIMONY	MAXWELL, JIM V. COUNTY OF SAN DIEGO, ALPINE FIRE PROTECTION		THIBODO, TODD	SAN DIEGO	
4/28/2015	DEPOSITION	MOTAMEDI V. REGENTS OF THE UNIVERSITY OF CALIFORNIA		MAKI, LISA	FP&H	
4/30/2015	DEPOSITION	MIDDLETON V. ST. JOSEPHS HOSPITAL AND REBER		HILLYARD, STEVEN	FP&H	
5/1/2015	DEPOSITION	HERNANDEZ, JOSE V. BOULEVARD MOTOR CAR COMPANY		GOLDSTEIN, HOWARD	IRVINE	
5/20/2015	TESTIMONY	GALLEGOS, JAMES V. HAVANA HOUSE	BC508561	GOLDBERG, TERRY	BURBANK	B
6/30/2015	DEPOSITION	LEON V. CITY OF SANTA ANA		VALENTINE, RENEE	WOODLAND HILLS	
7/6/2015	DEPOSITION	ADAMS, TIMOTHY V. ANDRADE, WEST COAST TURF, ET AL.		CLARK, WALTER	FP&H	
7/15/2015	DEPOSITION	HUERTA, MAGGY V. PACESETTER, INC.	BC526645	FOLINSKY, MARNI	FP&H	
7/16/2015	DEPOSITION	FINE, BRIAN V JON WILLEN, M.D.	BC501578	BUNCH, BRUCE	FP&H	
7/22/2015	ARBITRATION	CINTURA, WAYNE V. SULLIVAN AUTOMOTIVE GROUP, LLC, ET AL		SOKOLOFF, STEVEN	LOS ANGELES	415
8/14/2015	TESTIMONY	HUERTA, MAGGY V. PACESETTER, INC.		FOLINSKY, MARNI	LOS ANGELES	19
8/18/2015	TESTIMONY	GALLEGOS, JAMES V. HAVANA HOUSE	BC508561	GOLDBERG, TERRY	BURBANK	B
8/28/2015	DEPOSITION	PEARSON, LARRY V. ERIC LIN		NISSSEN, ANDREW	FP&H	
9/2/2015	DEPOSITION	ANTUNA, ET AL. V. COUNTY OF LOS ANGELES, ET AL.		GAGE, BRAD	BURBANK	
9/10/2015	DEPOSITION	RAZA, FARWA V. WILLIAM D. CONSTANTINO, ET AL.	30-201300646131	KOOSHKI, KAM	IRVINE	
9/21/2015	TESTIMONY	LEON V. CITY OF SANTA ANA		GALIPO, DALE	SANTA ANA	10A
9/29/2015	DEPOSITION	COBAR, DAVID V. WILLIAM HON WAI YONG	BC543195	OKHOVAT, SASAN	FP&H	
10/13/2015	DEPOSITION	VIVANCO		GUIZIN, LARRY	IRVINE	
10/26/2015	TESTIMONY	MOTAMEDI V. REGENTS OF THE UNIVERSITY OF CALIFORNIA		MAKI, LISA	SANTA ANA	C-11

**TIMOTHY LANNING**  
**2015**

DATE	EVENT	CASE	CASE #	ATTORNEY	LOCATION	DEPT
11/3/2015	DEPOSITION	LITCH, CRAIG V DCOR	56-2013-00442	HAWBECKER, ARIANNA	LOS ANGELES	
11/6/2015	TESTIMONY	TAPIA, FRANCISCO V. SAN GABRIEL TRANSIT, INC., ET AL.		FOLINSKY, MARNI	LOS ANGELES	28
11/20/2015	TESTIMONY	VIVANCO		GUIZIN, LARRY	CHATSWORTH	
11/23/2015	DEPOSITION	VARGAS, ANNA V. DOROTHY KILMAN	30-2014-00750	MITCHELL, TIM	FP&H	
12/3/2015	TESTIMONY	ANTUNA, ET AL. V. COUNTY OF LOS ANGELES, ET AL.		GAGE, BRAD	LOS ANGELES	
12/4/2015	DEPOSITION	CUSACK, SHAWN V. L & M TRANSPORTATION LLC	BC547717	GLASSMAN, ROBERT	FP&H	
12/21/2015	DEPOSITION	TANAKA V. RHB MANAGEMENT SOLUTIONS, ET AL.		HAMMOND, DONALD	FP&H	
12/22/2015	DEPOSITION	HARRIS, KECIA V. I HERB	KC063744	CLEIDIN, ATANOUS	GLENDALE	



**TIMOTHY LANNING**  
**2014**

DATE	EVENT	CASE	CASE #	ATTORNEY	LOCATION	DEPT
1/3/2014	DEPOSITION	HUDSON, JASON V. NORWALK-LA MIRADA UNIFIED SCHOOL DISTRICT		LYON, GEOFFREY	FP&H	
1/15/2014	DEPOSITION	LIZARRAGA V. ALWAN, M.D.		GEETING, STEVEN	SANTA ANA	
1/24/2014	DEPOSITION	GARCIA, DOLORES V. LOS ANGELES COUNTY		RICKS, CECIL	FP&H	
1/29/2014	DEPOSITION	BYERS, TRACY V. KAISER		HOVSEPIAN, NORA	FP&H	
2/3/2014	DEPOSITION	FOLEY-DAVID, MARY V. KAISER		HEITING, JAMES OTTO	FP&H	
2/5/2014	DEPOSITION	CAMPAIGNE, MARY ANN V. EGDA RACHOR		BILLINGS, JEFFREY	FP&H	
3/3/2014	TESTIMONY	HUMPHREY V. IKON OFFICE SOLUTIONS, INC.		MAZDA, MARK	LOS ANGELES	
3/3/2014	DEPOSITION	GILBERT, STEVEN V. REKLUSE MOTOR SPORTS, ET AL.		OWEN, GREGORY	VALENCIA	
3/5/2014	DEPOSITION	DRISCOLL V. DAVIS, ET AL.		JOHNSON, GLENN	FP&H	
3/28/2014	DEPOSITION	GLG ET AL. V. BURBANK UNIFIED SCHOOL DISTRICT	BC 453234	LEINBACH, BRIAN	LA CRESCENTA	
4/9/2014	TESTIMONY	BOSS, PEGGY V. KHALIL		CLEIDIN, ATANOUS	SANTA ANA	C24
5/6/2014	DEPOSITION	SARABIA, BARTOLA V. GARDENER TRUCKING INC.		DORDICK, GARY	BEVERLY HILLS	
5/7/2014	DEPOSITION	GALVIN, TERESA V. RONNIE GUTTIEREZ, ET AL.		WATTERS, RICHARD	ANAHEIM	
5/15/2014	DEPOSITION	MARCHESINI V. CASSUTO	EC058512	DRUCKER, BARRY	LOS ANGELES	
5/22/2014	DEPOSITION	MURILLO, VICTORIA AND DAVID V. LIN, ET AL	VC060989	MIRROKNIAN, REZA	FP&H	
6/23/2014	DEPOSITION	WYATT, VICTOR V UNION PACIFIC		DUPONT, MARK	PASADENA	
6/25/2014	DEPOSITION	DUNKELBERGER (ZURICH) V. QTS, INC. AND ALLPORT PACKING CORP.		CAVIOLA, JAMES	FP&H	
6/27/2014	DEPOSITION	NIEVES, ALEXIS V. CITY OF PALM SPRINGS	10006795	CLARK, WALTER	FP&H	
7/10/2014	DEPOSITION	LATHROP, FRANK V. MICHAEL R. TOLLIDAY CORP.		WATTERS, RICHARD	ANAHEIM	
7/22/2014	TESTIMONY	LATHROP, FRANK V. MICHAEL R. TOLLIDAY CORP.		WATTERS, RICHARD	FRESNO	503
7/23/2014	DEPOSITION	ESPARZA, FELIPE V. DR. PEPPER SNAPPLE GROUP		LYON, GEOFFREY	LOS ANGELES	
7/28/2014	DEPOSITION	BAKER-OSMAN, DENISE VS JEPSON		ROSENBERG, JOHN	FP&H	
7/30/2014	TESTIMONY	NIEVES, ALEXIS V. CITY OF PALM SPRINGS		CLARK, WALTER	RIVERSIDE	3
8/5/2014	DEPOSITION	ADAMSON V. CITY OF LONG BEACH		LYON, GEOFFREY	LONG BEACH	
8/11/2014	DEPOSITION	SARABIA V. ECOLOGY		STOLPMAN, THOMAS	FP&H	
8/21/2014	DEPOSITION	SPITTEL, AARON V. KAISER		CLEIDIN, ATANOUS	FP&H	
8/25/2014	DEPOSITION	PHILIPOPOLOUS		DUPONT, MARK	PASADENA	
8/26/2014	DEPOSITION	GOLDMAN, LINDA V NOEL LUSTIG, M.D. PSYCHIATRIC MEDICAL GROUP		BAIRD, ALISON	FP&H	
8/28/2014	DEPOSITION	AULT V. YAMAHA		PANCER, IAN	FP&H	

**TIMOTHY LANNING**  
2014

DATE	EVENT	CASE	CASE #	ATTORNEY	LOCATION	DEPT
9/3/2014	DEPOSITION	KHUNKHUN, JASWANT V. AVTAR GIL DBA GMT TRUCKING		LONGORIA, HECTOR	FRESNO	
9/8/2014	ARBITRATION	SPITTEL, AARON V. KAISER		CLEIDIN, ATANOUS	SANTA ANA	1600
9/10/2014	DEPOSITION	RIVERA V. COSTCO		SANSANOWICZ, LEONARD	FP&H	
9/25/2014	TESTIMONY	KHUNKHUN, JASWANT V. AVTAR GIL DBA GMT TRUCKING		LONGORIA, HECTOR	FRESNO	
9/30/2014	DEPOSITION	KIBBETT, BRUCE MICHAEL V. WALMART		HOFFMAN, DAVID	FP&H	
10/6/2014	TESTIMONY	RIVERA V. COSTCO		SANSANOWICZ, LEONARD	RIVERSIDE	10
10/15/2014	DEPOSITION	ZERMENO, RICARDO v. COUNTY OF RIVERSIDE SHERIFF'S DEPT., ET AL.		CARRAZCO, ANGEL	FP&H	
10/24/2014	DEPOSITION	ESPARZA, FELIPE V. DR. PEPPER SNAPPLE GROUP		LYON, GEOFFREY	LOS ANGELES	
11/3/2014	TESTIMONY	IZQUIERDO V. STATE OF CALIFORNIA, ET AL.		DAMONE, ROBERT	SANTA MONICA	R
11/18/2014	DEPOSITION	KING, KENNETH V. GATEWAY MEDICAL CENTER		FIELDS, MICHAEL	FP&H	
12/17/2014	DEPOSITION	CHOBO, AMANDA V. RIVERSIDE COUNTY REGIONAL MEDICAL CENTER		MAYNES, RODGER	FP&H	
12/18/2014	DEPOSITION	CHILSON V. WESTFIELD MALLS		STEIN, JOHN C.	PASADENA	



**CERTIFICATE OF SERVICE**

**STATE OF CALIFORNIA**

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within action; my business address is 11999 San Vicente Boulevard, Suite 345 Los Angeles, CA 90049.

On October 29, 2018, I served the foregoing documents described as: **PLAINTIFFS' SUPPLEMENTAL DISCLOSURES PURSUANT TO FEDERAL RULES OF CIVIL PROCEDURE 26(A)(1) AND 26(E)1** on the interested parties in this action.

*(See Attached Service List)*

☐ By placing the true copies thereof enclosed in sealed envelopes addresses as stated on the attached mailing list.

☒ **BY MAIL**

☒ As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐ **BY ELECTRONIC TRANSMISSION:** Based on a court order or an agreement of the parties to accept service by electronic transmission, I hereby certify that a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Courts system.

☐ **BY OVERNIGHT DELIVERY:**

☒ **BY ELECTRONIC MAIL** to: see attached service list

☐ **BY PERSONAL SERVICE** - I caused to be delivered such envelope by hand per the service list attached.

☐ **BY FACSIMILE** - I faxed a copy of the above-described document to the interested parties as set forth on the attached mailing list.

Executed on October 29, 2018 at Los Angeles, California.

☒ **(Federal)** I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Justin Farzadkish  
Name

/s/ Justin Farzadkish  
Signature

**SERVICE LIST**

RUBEN JUAREZ , ET AL. v. PRECISION VALVE & AUTOMATION, ET AL.  
CASE NO. 2:17-cv-03342

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